

EXHIBIT D

HIGHLY CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

)
IN RE NATIONAL PRESCRIPTION OPIATE)
LITIGATION)
)
This document relates to:)
) MDL No. 2804
The County of Summit, Ohio, et al. v. Purdue)
Pharma L.P., et al., Case No. 18-op-45090) Hon. Dan Aaron Polster
)
The County of Cuyahoga, Ohio, et al. v. Purdue)
Pharma L.P., et al., Case No. 17-op-45004)
)
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Expert Report of Larry Holifield

May 31, 2019

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I. INTRODUCTION

My name is Larry Holifield. I am the co-founder and Director of Corporate Integrity Services LLC, located at 5846 S Flamingo Road #3170, Cooper City, Florida. I have been retained as an independent expert witness by counsel for McKesson Corporation in In Re National Prescription Opiate Litigation, Case No. 17-md-2804, before the U.S. District Court for the Northern District of Ohio.

I understand that McKesson Corporation and other defendants in the above-referenced litigation may use my expert testimony at trial.

I prepared this report to comply with Rule 26(a)(2) of the Federal Rules of Civil Procedure. This report summarizes my current opinions, which are subject to change depending on ongoing discovery and additional information. My opinions in this report are based upon my training, education, and experience, as well as my review of documents in this case (as identified in Appendix B). My opinions set forth in this report are stated to a reasonable degree of certainty.

For trial, I may prepare visual aids to demonstrate various aspects of my testimony.

II. QUALIFICATIONS AND COMPENSATION

I have 37 years of combined law enforcement experience.

From 1970 to 1984, I worked for the St. Louis Police Department (“SLPD”). Throughout my career with the SLPD, I attended training programs to maintain my certification as a police officer in the State of Missouri. I also earned a Bachelor of Arts Degree in Political Science and Legal Justice in 1977 from Maryville University of St. Louis while working with the SLPD.

During my time as a police officer, I worked in a variety of different assignments, including uniform patrol and vice squad until being promoted to narcotics detective in 1976, which I remained throughout my tenure in the department. I received numerous awards at SLPD including Chiefs’ Letters of Commendation. I left the SLPD in 1984.

In 1984, I began working for the United States Drug Enforcement Administration (“DEA”). I worked for DEA for 23 years (1984-2007).

During my time at DEA, I served in multiple senior management roles, overseeing the investigation of international drug rings as well as supervising several units that focused on investigating drug diversion.

With tours of duty in Guatemala, Colombia, Mexico, and El Paso, Texas, I spent a significant portion of my DEA career investigating drug trafficking into the United States from Central America, South America, Mexico, and along the Southwest Border. In those roles, I developed expertise on international drug cartels and the flow of illicit drugs across the Southwest Border; I negotiated directly with law enforcement (including Justice Department officials) and numerous government agencies in foreign countries to reform their drug laws; and

I became familiar with the statutes and regulations that DEA relies on to combat drug trafficking and diversion.

From 1987 to 1992, I was a special agent assigned to the Guatemala City Country Office, which covered El Salvador, Belize, and Guatemala. During this timeframe, our office focused on combatting the emergence of new drug trafficking routes through Central America. Colombian drug trafficking organizations had opened these new routes in response to increased law enforcement efforts concentrated on the preexisting routes through the Southeastern United States and the Caribbean.

From 1992 to 1994, I was the Group Supervisor of the Organized Crime Drug Enforcement Task Force (“OCDETF”) and reported to the Assistant Special Agent in Charge of DEA’s San Francisco Field Office. As the Group Supervisor of OCDETF, I led the investigation of long-term, complex criminal cases. The majority of those cases involved multi-jurisdictional conspiracies of 20-30 people, and almost all had a nexus with Mexico or Colombia. We investigated drug cartels trafficking in crack cocaine, heroin, and methamphetamines. In 1994, I opened the DEA’s Oakland, California Office, which also targeted major drug trafficking organizations primarily from Mexico and Colombia.

In 1996, I received a special assignment as liaison to the Central Intelligence Agency in Bogota. Then, in 1998, I received a temporary promotion to become the Assistant Country Attaché to Bogota, Colombia.

In 1999, I returned to DEA Headquarters, at which time my promotion became permanent. I was assigned to be Co-Chair of the Linear Committee, a multi-agency task force that investigates large transnational narcotics traffickers. Although I was familiar with suspicious activity reports (“SARs”) used to identify financial links to the illicit drug trade from my prior duties as a Special Agent, I became more familiar with the complex statutes and regulations that mandate SARs by financial institutions during this tour of duty. In this role, I also attained significant knowledge regarding international drug cartels and the illicit sources of drugs abused in the United States.

In 2000, I became Section Chief for Mexico and Central America.

Later in the year 2000, I was transferred to Assistant Special Agent in Charge of the El Paso Field Office. During my time in the El Paso Field Office (2000-2002), I supervised all DEA units operating out of the office, including a diversion unit that consisted of diversion investigators and special agents. As part of my duties, I was responsible for conducting criminal investigations and enforcing compliance with the Controlled Substances Act and its implementing regulations.

From 2002-2006, I was the DEA’s Regional Director for Mexico and Central America. During that time, I oversaw two diversion investigators and was involved in high-level meetings and discussions with the Mexican government about drug-related reforms. At the time, my work on drug reform in Mexico was critical to combatting drug abuse in the United States because Mexican laws relating to the sale of drugs like pseudoephedrine had a direct impact on the availability of that substance to the drug cartels that used it to manufacture the methamphetamine

they trafficked across the border. I also continued to interface with and rely upon agents who had special training in suspicious activity reports (“SARs”) to identify financial links to the illicit drug trade.

From 2006-2007, I served as the Deputy Special Agent in Charge of the DEA’s Miami Field Division and was responsible for all DEA personnel in Florida from the top of the state down to Miami. DEA had a large Diversion Group in Florida at the time and its supervisor reported to me on its activities on a weekly basis. The Diversion Group had personnel in the Miami office and in regional offices in Ft. Lauderdale, Jacksonville, Orlando, and Tampa. In 2006-2007, the Diversion Group was focusing on investigations into internet pharmacies and pill mills, but it also worked with the State of Florida to reform Florida’s loose laws concerning licenses to own and operate pharmacies.

In 2007, I retired from the DEA. Throughout my career at DEA, I regularly attended training seminars and courses, including, but not limited to, asset forfeiture training, fingerprinting training, and training provided by CIA related to my international duties. I also received numerous awards while at DEA, including Sustained Superior Service Awards, two DEA Administrator’s Awards, and the Warren Medal from CIA.

In 2008, I began working for TurnStone Investigative Group as a Regional Director in Miami, Florida. At TurnStone, I managed and conducted complex domestic and international investigations. I am licensed as a private investigator in the state of Florida.

In 2012, I co-founded Corporate Integrity Services LLC (“CIS”), which is a licensed private investigative agency that provides consulting and investigative solutions to corporate entities, law firms, and individuals. From 2012 to present, I have worked as the Director of CIS. As part of my work at CIS, I frequently advise Mexican and other foreign clients about compliance with US drug laws, including DEA regulations.

My resume is attached as Appendix C.

I am being compensated for my time at my standard rate of \$250 per hour. My compensation is not based on the outcome of the litigation.

III. SCOPE OF REPORT

I have been asked to offer opinions on the following topics.

- 1) DEA’s operational structure and its enforcement priorities as they relate to the investigation of illicit drugs and the diversion of legal medications.
- 2) Registrants’ statutory and regulatory obligations related to maintenance of effective controls and controlled substance transaction reporting, including DEA’s enforcement of those requirements prior to the Distributor Initiative.
- 3) The evolution of diversion trends in the United States in the mid-2000s, including the role that rogue internet pharmacies played in that rise, and the resulting efforts

by DEA’s Office of Diversion Control to adapt its existing regulations to address these new threats.

- 4) The options available to enhance DEA’s regulatory and enforcement efforts to address new trends in diversion.
- 5) The effect of additional suspicious order reporting on DEA’s efforts to prevent diversion.
- 6) The contributors to the abuse of illicit drugs and legally produced controlled substances that are outside the control of registrants.

IV. SUMMARY OF OPINIONS

- A. DEA has historically prioritized combating illicit drugs and the transnational and domestic criminal organizations who traffic them over combating diversion of prescription drugs.
 1. DEA’s priorities are evidenced by the personnel it assigns to each task, the organizational structure it has adopted, and the resources it devotes to each task.
 - a) DEA often assigns diversion investigators without law enforcement powers to investigate diversion of prescription drugs, and assigns DEA agents with law enforcement powers to investigate illicit drugs and related criminal organizations.
 - b) DEA is organized so that diversion investigators ultimately report through their chain of command to DEA special agents.
 - c) DEA devotes greater resources and attention to investigate illicit drugs and related criminal organizations than it assigns to investigate diversion of prescription drugs.
 2. This prioritization reflects DEA’s focus on illicit drugs and related criminal organizations as a more harmful factor in the existing drug crisis than the diversion of prescription drugs.
- B. The Controlled Substance Act (“CSA”) and DEA’s implementing regulations set forth limited—and sometimes vague—requirements related to registrants’ responsibility to maintain effective controls against theft or diversion.
 1. The purpose of CSA and DEA’s implementing regulations is to keep prescription drugs safe within the “closed system of distribution.”
 2. The DEA’s implementing regulations have largely remained the same since 1971.

3. The standards for determining whether registrants are maintaining effective controls against theft and diversion are contained in 21 C.F.R. §§ 1301.71-1301.76.
 - a) The regulations state that the determination of whether a registrant has provided “effective controls against diversion” are based upon compliance with “the standards for physical security controls and operating procedures necessary to prevent diversion” as set forth in 21 C.F.R. §§ 1301.72-1301.76, e.g., defining the required thickness of the concrete surrounding a controlled substance vault, requiring restricted access to controlled substance processing areas, etc.
 - b) The only due diligence of a customer that a registrant is required to conduct under the regulations is a “good faith” effort to ensure the customer is registered to possess controlled substances. The regulations do not state that a registrant must conduct any other investigation of its customers.
 - c) The only requirements related to “suspicious orders” under the regulations is that a registrant must implement a system to identify and report “suspicious orders” to DEA.
 - d) The regulations do not state that a registrant must investigate “suspicious orders” or halt them prior to shipment.
4. My opinions regarding the CSA and DEA’s implementing regulations are consistent with my experiences supervising diversion units. The units’ inspected pharmacies to ensure they were secured against theft and had accounted for their inventory of controlled substances. The units also reviewed registrants’ suspicious order monitoring programs for compliance.

C. New diversion trends in the mid-2000s demonstrated the inadequacy of the existing DEA regulations; DEA responded by attempting to stretch the 1971 regulations to address the new problem.

1. The unprecedented rise of rogue internet pharmacies, and later pills mills, were the primary diversion threat in the mid- and late-2000s.
2. DEA was under significant pressure to address the rise of prescription drug abuse in the mid-2000s.
3. In response, DEA sent a “Dear Registrant” letter in December 2007 that attempted to change the expectations set forth in DEA’s regulations.

4. Through these letters, and without support in the CSA or its implementing regulations, DEA attempted to shift its law enforcement role to registrants who did not have at their disposal the law enforcement experience or the many investigatory tools available to DEA, such as administrative subpoenas, search warrants, wire taps, undercover personnel to conduct surveillance, or the ability to seize records and computers.

D. There were other legitimate options available to enhance DEA's regulatory and enforcement efforts to address new trends in diversion that were not implemented.

1. The CSA was not amended to expand the duties of registrants beyond those set forth in the original statute.
2. DEA did not issue any new regulations or revise existing regulations relating to the control of the manufacture, distribution, and dispensing of controlled substances as it is authorized to do under 21 U.S.C. § 821.
3. DEA did not provide specific guidance regarding how to identify "suspicious orders," investigate "suspicious orders," investigate their customers, and/or determine which "suspicious orders" or customers should be rejected.

E. If registrants had filed more suspicious order reports it would not have had meaningful impact on DEA's efforts to prevent diversion.

1. DEA already had information on potential "suspicious orders" in its ARCOS data that it could use to identify possible diversion.
 - a) Distributors and manufacturers reported all transactions involving purchase or sale of prescription opioid medications to the ARCOS reporting system. ARCOS reporting tools allowed DEA to identify pharmacies that were receiving extraordinarily large volumes of narcotics; DEA did not need registrant's suspicious order reports to do that.
 - b) DEA did not provide registrants access to ARCOS data. Registrants only gained access to limited ARCOS data in 2018.
2. Only a small fraction of suspicious order reports ever resulted in DEA actions against registrants, and DEA's regular practice was to not respond to the suspicious order reports received.
3. There is no basis to conclude that additional suspicious order reports would have resulted in a meaningful decrease in diversion.

F. Factors outside the control of registrants have contributed to the abuse of illicit drugs and legally produced controlled substances inside Summit County and Cuyahoga County.

1. Drug abuse, including abuse of opioid drugs, existed in the United States prior to the diversion of prescription opioids and will continue in the future regardless of the availability of prescription opioids.
2. The current opioid epidemic is best understood in the context of a decades long drug overdose epidemic that began at least as early as the 1970s and has grown exponentially worse over the years.
3. Although drug trafficking and abuse have been increasing for decades, the abuse of a particular illicit drug is often cyclical, with certain drugs rising in popularity before fading and then spiking again in the future.
4. The drug overdose epidemic is fueled by drug trafficking organizations that have long distributed illicit drugs, including illicit opioids, outside the “closed system of distribution.”
5. The introduction of highly potent and dangerous illicit fentanyl from international sources is the primary factor fueling the current drug overdose epidemic.
6. The intentional decisions of individual bad actors—including employees of the plaintiffs themselves—that trafficked illicit opioids or diverted prescription opioids outside the controls of the defendant registrants are also responsible for the opioid-related problems in Cuyahoga County and Summit County.

V. DEA’S OPERATIONAL STRUCTURE AND ITS ENFORCEMENT PRIORITIES

In my personal experience as a 23-year veteran of DEA, the DEA has always considered illicit drugs and the transnational and domestic criminal organizations that traffic them to be the highest threat to the American public.¹ DEA devotes considerable law enforcement resources to detecting and investigating these criminal organizations and preventing them from trafficking illicit drugs in the United States. In contrast, DEA has treated combating diversion of legally produced controlled substances as a lower priority.² DEA’s efforts to combat diversion of

¹ U.S. Department of Justice, Office of the Inspector General, Audit Report 12-05, Audit of the Drug Enforcement Administration’s Personnel Resource Management and Casework (2011) (“2011 OIG Audit Report”) at Executive Summary (“The DEA focuses on disrupting and dismantling Priority Target Organizations (PTO), which are the major drug supply and money laundering organizations that have a significant impact upon drug availability in the United States.”); Keith Martin (“Martin”) Dep. 214:8-214:19 (testifying that stopping drug cartels has always been one of DEA’s priority focuses).

² U.S. Department of Justice, Office of the Inspector General, I-2002-010, Review of the Drug Enforcement Administration’s Investigations of the Diversion of Controlled Pharmaceuticals (2002) (“2002 OIG Report”) at 28 (small minority of all investigators’ time is spent on pharmaceutical diversion); 2011 OIG Audit Report at 4 (small minority of all investigators are

legally produced controlled substances generally consisted of using non-law enforcement personnel, *i.e.*, diversion investigators, to investigate registrants to ensure compliance with technical recordkeeping, suspicious order reporting, and physical security regulations.³

A. Personnel

DEA has more than 20 field division offices and more than 200 sub-offices located throughout the United States.⁴ The staff at DEA field offices are primarily special agents who often do not receive formal diversion training or participate in diversion investigations.⁵ But each of the field division offices and some of the sub-offices have a diversion control unit that is staffed by diversion investigators.⁶

Diversion investigator training consists of a 12-week basic course that covers “(1) an overview of diversion control, (2) techniques for diversion investigations, (3) the laws and regulations governing the Diversion Control Program, (4) an overview of chemical diversion control, and (5) criminal investigations.”⁷ After completing the training course, diversion investigators are assigned to the field.⁸

devoted to diversion), 73 (737 personnel utilized on diversion cases and 6,436 personnel utilized on illegal drug cases).

³ 21 C.F.R. § 1301.74 (requiring reporting of suspicious orders); 21 C.F.R. § 1305.12 (requiring completion of DEA Form 222 in triplicate), 21 C.F.R. § 1304.11 (requiring complete and accurate inventories); 21 C.F.R. § 1301.75 (requiring controlled substances to be stored in “securely locked, substantially constructed cabinet”).

⁴ DEA Domestic Divisions, <https://www.dea.gov/domestic-divisions>; 2002 OIG Report at 5; U.S. Department of Justice, Office of the Inspector General, I-2006-004, Follow-Up Review of the Drug Enforcement Administration’s Efforts to Control the Diversion of Controlled Pharmaceuticals (2006) (“2006 OIG Report”) at 8.

⁵ Martin Dep. 31:12-23 (testifying that he never received diversion training and did not recall ever working on any diversion investigations while working as a special agent from 1995 to 2004), 64:18-65:22 (testifying that he was unaware of his enforcement agents or group supervisors ever attending special agent diversion training); U.S Government Accountability Office, GAO-11-744, Prescription Drug Control: DEA Has Enhanced Efforts to Combat Diversion, But Could Better Assess and Report Program Results (2011) (“2011 GAO Report”), at 24 (describing diversion training course that is only provided to special agents specifically assigned to diversion control), 11-12 (explaining that only five special agents in 2008 and 141 special agents in 2011 were specifically assigned to diversion control).

⁶ 2002 OIG Report at 5.

⁷ 2011 GAO Report at 22 (describing training program for diversion investigators).

⁸ 2011 GAO Report at 22 (“After the completion of basic training, the investigators enter into duty under a 1-year probationary period with a midpoint review provided after 6 months of duty.”).

Diversion investigators are responsible for initiating administrative, civil, or criminal action against suspected sources of diversion.⁹ But while special agents have full law enforcement authority, diversion investigators do not.¹⁰ This means that diversion investigators cannot conduct surveillance or undercover work, direct or pay confidential informants, carry weapons, or serve arrest and search warrants.¹¹ When diversion investigators need these law enforcement activities to build a case, they must request assistance from special agents or state and local law enforcement officers.¹²

In practice, special agents spend only a very small portion of their time working on diversion investigations.¹³ This is consistent with my experience in the field and my understanding of DEA's priorities. Special agents, with law enforcement authority, spent the overwhelming majority of their time building cases against illicit drug traffickers, which is the top priority at DEA.¹⁴ In contrast, diversion investigators, without law enforcement authority, focused on conducting investigations of registrants to ensure compliance with the CSA and its regulations, including but not limited to, technical recordkeeping, suspicious order reporting, and physical security regulations.¹⁵ When diversion investigators identified concerns about a

⁹ 2002 OIG Report at 14.

¹⁰ 2002 OIG Report at 5.

¹¹ 2002 OIG Report at 8, 14. In contrast, special agents or “[e]nforcement agents,” “carry guns. They have arrest authority, arrest powers. But they investigate all -- all criminal -- all criminal, civil violations of the Controlled Substances Act. They are not limited to what they investigate.” Joseph Rannazzisi (“Rannazzisi”) Dep. (Day 1) 151:7-12.

¹² 2002 OIG Report at 14.

¹³ 2002 OIG Report at 12 n.7 (“DEA officials told us that a reasonable estimate would be 1 to 3 percent of the agent’s total time [is spent on diversion investigations].”); 2006 OIG Report at 76 (“[I]n our current review the percentage of special agent time dedicated to pharmaceutical diversion investigations was at most 2.2 percent.”)

¹⁴ 2002 OIG Report at 12 n.7 (“DEA officials told us that a reasonable estimate would be 1 to 3 percent of the agent’s total time [is spent on diversion investigations].”); 2006 OIG Report at 76 (“[I]n our current review the percentage of special agent time dedicated to pharmaceutical diversion investigations was at most 2.2 percent.”); 2011 OIG Audit Report at 73 (showing 737 personnel utilized on diversion cases and 6,436 personnel utilized on illegal drug cases).

¹⁵ 2011 OIG Audit Report at 10 (explaining that diversion investigators “conduct [regulatory] investigations, [at which they] inspect and verify the registrant’s records, take a physical inventory of the registrant’s controlled substances, and inspect any other items necessary to verify the registrant’s compliance with the CSA and its implementing regulations,” and also “conduct preliminary investigative work to determine whether [a complaint of diversion] is valid and warrants a full investigation”); 21 C.F.R. 1301.74 (requiring suspicious order reporting); 21 C.F.R. § 1305.12 (requiring completion of DEA Form 222 in triplicate), 21 C.F.R. § 1304.11 (requiring complete and accurate inventories); 21 C.F.R. § 1301.75 (requiring controlled substances to be stored in “securely locked, substantially constructed cabinet”); Martin Dep. 289:19-290:5 (testifying that diversion agents “do not carry weapons” and confirming that they are “more regulatory based than crime based”). For descriptions of diversion investigators’ jobs, Thomas Prevoznik (“Prevoznik”) Rule 30(b)(6) Dep. (Day 1) 81:12-19 (“A. [A]s as a diversion

registrant's suspicious order monitoring policies they would be raised with the registrant.¹⁶ When diversion investigators identified a potential need for law enforcement activities to investigate diversion, they would submit that request to a supervisor, such as myself, who would then determine whether special agents should be assigned to assist with the diversion investigation or continue with investigations of illicit drugs.¹⁷

B. Organization

As Assistant Special Agent in Charge of the El Paso Field Office, Regional Director for Mexico and Central America, and Deputy Special Agent in Charge of DEA's Miami Field Division, I received regular reports from supervisors of the diversion teams regarding their investigative activities. As noted above, I would also receive requests from diversion investigators for special agents to assist with law enforcement activities. This is consistent with the overall organizational structure of DEA. Although DEA's diversion control activities are coordinated from DEA headquarters, they are primarily conducted by DEA's field offices, and the operational activities of the diversion control units are overseen by special agents.¹⁸ This is

investigator, we conduct -- we conduct investigations, whether it's scheduled investigations, where we're out at the registrants' facilities. It's doing administrative investigations, civil investigations, criminal investigations, compliant investigations."); Rannazzisi Dep. (Day 2) 382:12-19 ("Q. So as a diversion investigator, what would you do? A. We would investigate the methods trying to determine why or how those drugs are being removed from the illicit supply chain, how they are getting to the illicit supply chain and investigate and then take action to stop them from happening.").

¹⁶ Prevoznik Rule 30(b)(6) Depo. Tr. (Day 1) 53:24-6 ("It would also be used in our scheduled investigations. That's when we're out at the registrants and we use it to review the suspicious ordering monitoring system that they have in place to ensure that they are actually doing what they say they are going to do."), 289:21-290:20 ("A. Schedule[d] investigation[s] are ... a diversion investigator's work plan. So they will be assigned certain registrants that we will go out and inspect their facility, their registration. Q. And is that inspection or visit different from what might be referred to as a DEA audit or are they -- A. They're the same. Q. The same. Got it. And during a scheduled investigation or audit, does the DEA review a registrant's written policies? A. Their protocols? Q. Yes. A. Yes. Q. And if the DEA has concerns about those policies, does it raise those concerns with the registrant? . . . A. To my -- yes, they do.").

¹⁷ 2002 OIG Report at 16 (describing August 2001 memorandum from DEA's Operations Division that "designated an Assistant Special-Agent-in-Charge (ASAC) at each field office to oversee the operational activities of the diversion control program"); 2006 OIG Report at 75 ("Diversion investigators still do not have law enforcement authority and continue to rely on special agent support to conduct critical tasks in criminal diversion investigations."); 2011 GAO Report at 11 ("[Diversion] investigators do not have law enforcement authority Special Agents . . . assist Diversion Investigators by performing law enforcement functions").

¹⁸ 2002 OIG Report at 16 (describing August 2001 memorandum from DEA's Operations Division that "designated an Assistant Special-Agent-in-Charge (ASAC) at each field office to oversee the operational activities of the diversion control program"); Prevoznik Rule 30(b)(6) Dep. (Day 1) 58:15-20 ("Q. So is it fair to say that the primary purpose then of your current unit,

consistent with diversion investigations being treated as a lower priority compared to investigations of illicit drug trafficking organizations.

C. Resources

DEA devotes greater resources and attention to investigating illicit drug trafficking than it devotes to investigating diversion of legally produced controlled substances. Historically, in the period 1997 to 2001, DEA spent less than 10% of its total investigative time on investigations of controlled pharmaceuticals and more than 90% of its total investigative time on investigations of illicit drugs.¹⁹ During that same time period diversion investigators made up less than 12% of the total number of investigators at DEA.²⁰ The percentage of all investigators devoted to diversion cases as opposed to illicit drug trafficking cases remained below 12% through at least 2010.²¹ This is consistent with diversion investigations being treated as a lower priority compared to investigations of illicit drug trafficking organizations.²²

In my experience, DEA focused its resources on combating illicit drugs and related criminal organizations over diversion of prescription drugs because illicit drugs are a more harmful factor in the existing drug crisis than the diversion of prescription drugs. In setting funding and priorities for DEA, Congress, the President, the Attorney General, and the Administrator of DEA have determined that criminal organizations that traffic illicit drugs are the most significant factor in the existing drug crisis.

VI. REGISTRANTS' STATUTORY AND REGULATORY OBLIGATIONS

As a 23-year veteran of DEA, I am familiar with the Controlled Substances Act (“CSA”) and the related regulations. I have reviewed portions of the CSA and related regulations in preparing my expert opinion.

A. Overview of Controlled Substances Act and Closed System of Distribution

the pharmaceutical investigations section, is to provide support to the field and their various investigations? A. Correct.”).

¹⁹ 2002 OIG Report at 12, 28.

²⁰ 2002 OIG Report at 11.

²¹ 2011 OIG Audit Report at 73 (showing 737 personnel utilized on diversion cases and 6,436 personnel utilized on illegal drug cases).

²² Martin Dep. 59:13-60:4 (“Q. ... And on diversion, part of the responsibility of the teams that you have working under you [the ASAC of the field office] would be knowing where diversion occurs in your jurisdiction, who is diverting, and what steps DEA will take to stop the diversion, including making sure that DEA does not contribute to the diversion? ... A. So, again, the diversion side does not necessarily report to me. They don't like -- they don't tell me what they're doing.”).

Congress passed the CSA in 1970.²³ The CSA established a “closed system” of distribution for controlled substances.²⁴ The DEA is the government agency that controls the closed system of distribution.²⁵ Only individuals that obtain a registration from the DEA are permitted to manufacture, distribute, dispense, import, or export controlled substances.²⁶ The

²³ Comprehensive Drug Abuse Prevention and Control Act of 1970, Pub. L. No. 91-513, §§ 100-709, 84 Stat. 1236, 1242-1284 (1970).

²⁴ 21 U.S.C. § 822 (requiring every person who manufactures, distributes, or dispenses controlled substances to register with the Attorney General); 21 U.S.C. § 823 (mandating that the Attorney General register manufacturers, distributors, and dispensers of controlled substances); 21 C.F.R. § 1301.11 (requiring “[e]very person who manufactures, distributes, dispenses, imports, or exports any controlled substance or who proposes to engage in the manufacture, distribution, dispensing, importation or exportation of any controlled substance [to] obtain a registration”); Improving Predictability and Transparency in DEA and FDA Regulation, Hearing Before the Subcomm. on Health of the H. Comm. on Energy and Commerce, 113th Cong., 113-137 (2014) (prepared statement of Joseph T. Rannazzisi, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Administration) at 83 (“[T]he CSA requires the DEA to establish and maintain a system that strictly controls and monitors the flow of controlled substances in the United States, from the point of importation and manufacture, to distribution, dispensing, and finally, disposal. This is the ‘closed system of distribution.’”).

²⁵ 21 U.S.C. § 823 (mandating that the Attorney General register manufacturers, distributors, and dispensers of controlled substances); 28 C.F.R. § 0.100 (delegating Attorney General’s authority pursuant to CSA to DEA Administrator); 21 C.F.R. § 1301.11 (requiring “[e]very person who manufactures, distributes, dispenses, imports, or exports any controlled substance or who proposes to engage in the manufacture, distribution, dispensing, importation or exportation of any controlled substance [to] obtain a registration”); 21 C.F.R. § 1301.31 (directing DEA Administrator to review applications for registration); 21 C.F.R. § 1301.35 (directing DEA Administrator to issue registrations when appropriate); Rannazzisi Dep. (Day 1) at 49:24-50:1 (“Q. It’s true that DEA controls the closed system of drug distribution, right? A. Yes.”); Kyle Wright (“Wright”) Dep. (Day 2) 297:6-14 (“[A.] I’ll try to say it in a nutshell: to maintain, oversee and protect the closed system of distribution at all levels. … Q. Was that the role of the Drug Enforcement Agency [sic], as you understood it in your experience? A. Yes, sir.”); Improving Predictability and Transparency in DEA and FDA Regulation, Hearing before the Subcomm. on Health of the H. Comm. on Energy and Commerce, 113th Cong., 113-137 (2014) (prepared statement of Joseph T. Rannazzisi, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Administration) at 83 (“[T]he CSA requires the DEA to establish and maintain a system that strictly controls and monitors the flow of controlled substances in the United States, from the point of importation and manufacture, to distribution, dispensing, and finally, disposal. This is the ‘closed system of distribution.’”).

²⁶ 21 U.S.C. § 822 (requiring every person who manufactures, distributes, or dispenses controlled substances, or proposes to do so, to register with the Attorney General); 28 C.F.R. § 0.100 (delegating Attorney General’s authority pursuant to CSA to DEA Administrator); 21 C.F.R. § 1301.11 (requiring “[e]very person who manufactures, distributes, dispenses, imports, or exports any controlled substance or who proposes to engage in the manufacture, distribution, dispensing, importation or exportation of any controlled substance [to] obtain a registration”); 21 C.F.R. § 1301.31 (directing DEA Administrator to review applications for registration); 21 C.F.R. § 1301.35 (directing DEA Administrator to issue registrations when appropriate); Rannazzisi Dep.

DEA must approve the registration applications from manufacturers, distributors, pharmacies, and doctors before they can handle controlled substances.²⁷

The Administrator of DEA is responsible for making the determination about whether to grant a registrant's application because the Attorney General delegated this task to the Administrator of DEA.²⁸ The Attorney General assigned his powers under the CSA to the Administrator of DEA, including the authority to create or revise regulations to implement the CSA.²⁹

B. Registration Requirements under the Controlled Substances Act

DEA is required by the CSA in 21 U.S.C. § 823 to grant the registration applications for controlled substances unless the applications are inconsistent with the public interest (or U.S. obligations under international treaties, conventions, or protocols).³⁰ The CSA in 21 U.S.C. § 823 provides factors that DEA must consider when making a decision about whether granting the registration application for controlled substances is consistent with the public interest.

(Day 1) at 51:2-8 (“Q. It's true the DEA registers all manufacturers, distributors, pharmacies and doctors that handle Schedule II controlled substances? A. That's true.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) at 267:23-268:3 (testifying that the “closed system of distribution” is “the system ... which Congress enacted for the authorized handling of controlled substances. So it requires ... DEA registration; everybody needs to be registered”).

²⁷ 21 C.F.R. § 1301.31 (directing DEA Administrator to review applications for registration); 21 C.F.R. § 1301.35 (directing DEA Administrator to issue registrations when appropriate); Rannazzisi Dep. (Day 1) at 52:10-22 (confirming that “[w]hen deciding to grant registration [applications] to a manufacturer, distributor, pharmacy or doctor, the DEA inspects documentation from ... potential registrants”); Prevoznik Rule 30(b)(6) Dep. (Day 1) at 267:23-268:3 (testifying that the “closed system of distribution” is “the system ... which Congress enacted for the authorized handling of controlled substances. So it requires ... DEA registration; everybody needs to be registered”).

²⁸ 21 U.S.C. § 823 (mandating that the Attorney General register manufacturers, distributors, and dispensers of controlled substances); 28 C.F.R. § 0.100 (delegating Attorney General's authority pursuant to CSA to DEA Administrator); 21 C.F.R. § 1301.31 (directing DEA Administrator to review applications for registration); 21 C.F.R. § 1301.35 (directing DEA Administrator to issue registrations when appropriate).

²⁹ 21 U.S.C. § 821 (authorizing Attorney General to “promulgate rules and regulations ... relating to the registration and control of the manufacture, distribution, and dispensing of controlled substance”); 28 C.F.R. § 0.100 (delegating Attorney General's authority pursuant to CSA to DEA Administrator); Rannazzisi Dep. (Day 1) 58:21-24 (“The regulation change would be under the authority of the administrator of the Drug Enforcement Administration and Department of Justice.”), 59:1-3 (“the final decision [to change a CSA regulation] is [up to] the Department of Justice and the Drug Enforcement Administration leadership”).

³⁰ 21 U.S.C. § 823.

21 U.S.C. § 823 lists the factors that DEA must consider when deciding whether granting the applications of manufacturer and distributor registrants is in the public interest. 21 U.S.C. § 823(b) and (e) list the factors for distributors and require DEA to consider “maintenance of effective controls against diversion of particular controlled substances into other than legitimate medical, scientific, and industrial channels.”³¹ 21 U.S.C. § 823(a) and (d) list the factors for manufacturers and include “maintenance of effective controls against diversion of particular controlled substances and any controlled substance … compounded therefrom into other than legitimate medical, scientific, research, or industrial channels.”³² Although DEA is required by 21 U.S.C. § 823 to consider the applicant’s “maintenance of effective controls against diversion” when deciding whether to grant a registration,³³ § 823 does not create separate obligations for manufacturers or distributors to investigate whether their customers are maintaining effective controls against diversion of controlled substances into illegitimate channels.³⁴

In addition to registering manufacturers, distributors, pharmacies, and doctors, DEA has the authority to revoke or suspend the registrations.³⁵ DEA has the authority to issue an “order to show cause why a registration should not be revoked or suspended.”³⁶ DEA also has the authority to immediately suspend [a] registration where it “finds that there is an imminent danger to the public health or safety.”³⁷

C. Requirements for “Effective Controls” Outlined in the Regulations

The specific requirements for “maintenance of effective controls” are identified in DEA’s implementing regulations, 21 C.F.R. §§ 1301.71-76. 21 C.F.R. § 1301.71(a) explains “[a]ll

³¹ 21 U.S.C. § 823(b)(1) (relating to distributors of controlled substances in schedule I or II), (e)(1) (relating to distributors of controlled substances in schedule III, IV, or V).

³² 21 U.S.C. § 823(a)(1) (relating to manufacturers of controlled substances in schedule I or II), (d)(1) (relating to manufacturers of controlled substances in schedule III, IV, or V).

³³ 21 U.S.C. § 823(a)(1), (b)(1), (d)(1), (e)(1).

³⁴ Rannazzisi Dep. (Day 2) 526:19-527:3 (“Q. Okay. Now, within the Controlled Substances Act ... the words ‘know your customer’ does not appear, correct? A. The words ‘know your customer’ is not in the Controlled Substances Act. Q. And the words ‘due diligence’ are not in the Controlled Substances Act either, right? A. That is correct.”); Demetra Ashley (“Ashley”) Dep. 159:20-160:3 (“Q. ... Going back to know your customer’s customer, to your knowledge, is there any language in the Controlled Substances Act that states that a manufacturer is required to know its customer’s customer? A. In the Controlled Substances Act, no. Q. Is that phrase anywhere in the CSA to your knowledge? A. To my knowledge, no.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 209:1-7 (“Q. Now, did the Controlled Substances Act in this time period state that the registrants must know their customer to decide whether an order is suspicious or not? A. It does not have that specific language.”); 21 U.S.C. § 823.

³⁵ 21 U.S.C. § 824 (providing for denial, revocation, or suspension of registrations); 21 C.F.R. § 1301.36 (describing DEA’s authority to suspend or revoke registrations”).

³⁶ 21 C.F.R. § 1301.37.

³⁷ 21 C.F.R. § 1301.36.

applicants and registrants shall provide effective controls and procedures to guard against theft and diversion of controlled substances.”³⁸ The regulation goes on to explain that, “[i]n order to determine whether a registrant has provided effective controls against diversion, the Administrator shall use the security requirements set forth in Secs. 1301.72-1301.76 as standards for the physical security controls and operating procedures necessary to prevent diversion.”³⁹ The security requirements identified in 21 C.F.R. §§ 1301.72-1301.76 primarily focus on making sure that controlled substances are safe and secure while the controlled substances are in a registrant’s custody and control.⁴⁰ This focus is consistent with my experiences supervising a diversion unit in El Paso from 2000 to 2002. As reported to me, the diversion unit’s primary focus was on inspecting pharmacies to ensure they were secured against theft and had accounted for their inventory of controlled substances. The diversion unit also inspected the registrants’ suspicious order monitoring programs.⁴¹ I briefly describe 21 C.F.R. §§ 1301.72, .73, .75, and .76 below, before turning to 21 C.F.R. § 1301.74.

1. Section 1301.72

Section 1301.72 describes the secured areas where controlled substances must be stored in extensive detail. For example, the regulation requires: “A vault constructed after September 1, 1971 … [shall have] walls, floors, and ceilings … constructed of at least 8 inches of reinforced concrete or other substantial masonry, reinforced vertically and horizontally with 1/2-inch steel rods tied 6 inches on center, or the structural equivalent to such reinforced walls, floors, and ceilings.”⁴² The regulation goes on to provide various other physical security requirements for registrants who are not physicians.⁴³

³⁸ 21 C.F.R. § 1301.71(a).

³⁹ 21 C.F.R. § 1301.71(a).

⁴⁰ 21 C.F.R. §§ 1301.72 (describing secured areas where controlled substances must be stored by); 1301.73 (describing safeguard to maintain the security of controlled substances during the manufacturing process); 1301.74 (describing “good faith” registration check required before sending controlled substances to a customer); 1301.75 (describing physical storage requirements for practitioners).

⁴¹ Prevoznik Rule 30(b)(6) Depo. Tr. (Day 1) 53:24-6 (“It would also be used in our scheduled investigations. That's when we're out at the registrants and we use it to review the suspicious ordering monitoring system that they have in place to ensure that they are actually doing what they say they are going to do.”), 289:21-290:20 (“A. Schedule[d] investigation[s] are … a diversion investigator's work plan. So they will be assigned certain registrants that we will go out and inspect their facility, their registration. Q. And is that inspection or visit different from what might be referred to as a DEA audit or are they -- A. They're the same. Q. The same. Got it. And during a scheduled investigation or audit, does the DEA review a registrant's written policies? A. Their protocols? Q. Yes. A. Yes. Q. And if the DEA has concerns about those policies, does it raise those concerns with the registrant? … A. To my -- yes, they do.”).

⁴² 21 C.F.R. § 1301.73(a)(3)(i).

⁴³ 21 C.F.R. § 1301.72(a).

2. Section 1301.73

Section 1301.73 describes various safeguards to maintain the security of controlled substances during the manufacturing process.⁴⁴ For example, it directs that “[a]ll in-process substances shall be returned to the controlled substances storage area at the termination of the process,”⁴⁵ “[m]anufacturing activities with controlled substances shall be conducted in an area or areas of clearly defined limited access which is under surveillance,”⁴⁶ and “[d]uring the production of controlled substances, the manufacturing areas shall be accessible to only those employees required for efficient operation.”⁴⁷

3. Section 1301.75

Section 1301.75 describes the physical storage rules that practitioners, such as pharmacists, must follow with controlled substances.⁴⁸ For example, it directs that controlled substances “shall be stored in a securely locked, substantially constructed cabinet.”⁴⁹

4. Section 1301.76

Section 1301.76 requires that practitioners not employ certain individuals that may be likely to divert controlled substances (e.g., individuals convicted of felonies related to controlled substances).⁵⁰ It also requires practitioners to report the “theft or significant loss of any controlled substance.”⁵¹ Finally, it requires that practitioners that act as distributors must comply with certain regulations related to distributors.⁵²

5. Section 1301.74

a) Requirements in Section 1301.74(a)

Section 1301.74(a) requires a registrant to “make a good faith inquiry” to determine that a customer “is registered to possess the controlled substance.”⁵³ The regulation does not reference “due diligence” or any other investigation that a registrant is required to perform on a customer prior to completing a transaction beyond the “good faith inquiry” as to the customer’s

⁴⁴ 21 C.F.R. § 1301.73.

⁴⁵ 21 C.F.R. § 1301.73(a).

⁴⁶ 21 C.F.R. § 1301.73(b).

⁴⁷ 21 C.F.R. § 1301.73(c).

⁴⁸ 21 C.F.R. § 1301.75

⁴⁹ 21 C.F.R. § 1301.75(a) & (b).

⁵⁰ 21 C.F.R. § 1301.76(a).

⁵¹ 21 C.F.R. § 1301.76(b).

⁵² 21 C.F.R. § 1301.76(c)-(d).

⁵³ 21 C.F.R. § 1301.74(a).

registration status.⁵⁴ For example, there is no requirement set forth in § 1301.74 requiring a registrant to “know your customers” to “know your customer’s customer,” or to know who is ultimately prescribing the medications.⁵⁵ The regulation also does not require any additional due diligence by registrants other than a good faith inquiry to determine that the customer is registered to handle controlled substances.⁵⁶ The regulation also does not require registrants to create or maintain “due diligence” files on their customers.⁵⁷

The scope of the regulatory requirements I describe above is consistent with my experience supervising a diversion unit prior to 2006. While I was Assistant Special Agent in

⁵⁴ 21 C.F.R. § 1301.74(a).

⁵⁵ 21 C.F.R. § 1301.74; Rannazzisi Dep. (Day 2) 534:4-9 (“Q. Okay. Now, in that section [21 C.F.R. § 1301.74], does the word or words ‘know your customer’ appear? A. No, ma’am. Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 212:1-4 (“Q. Today, does the regulation explicitly reference knowing your customer? A. No.”), 325:1-12 (“Q. But neither the statute nor the regulation says explicitly that manufacturers need to know their customers’ customers, do they? A. It does not say that explicitly. But it does say that you need to guard against diversion. Q. Has the DEA ever provided guidance to the industry in writing informing registrants that they are to know their customers’ customers? A. Not that I’m aware of.”).

⁵⁶ Rannazzisi Dep. (Day 2) 534:4-24 (“Q. Okay. Now, in that section [21 C.F.R. § 1301.74], does the word or words ‘know your customer’ appear? A. No, ma’am. Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am. Q. Do the words ‘dispensing data’ appear in this regulation? A. No, ma’am. Q. Do the words ‘customer questionnaire’ appear in this regulation? A. No, ma’am. Q. Do the words ‘electronic order monitoring system’ appear in this regulation? A. No, ma’am. Q. Do the words ‘do not ship’ appear in this regulation? A. No, ma’am. Q. Do the word ‘dispensing data’ appear in this regulation? A. No, ma’am.”); Ashley Dep. 215:12-216:4 (“Q. Is [due diligence] explained in the federal regulation, [21 C.F.R. 1301.74]? ... A. No.”); Wright Dep. (Day 2) 496:8-14 (“Q. So the due diligence that got referenced in your discussion this morning, that is not required by the statute or the regulation, correct? . . . THE WITNESS: It is not mentioned specifically.”); 21 C.F.R. §§ 1301.71-.76.

⁵⁷ 21 C.F.R. §§ 1301.71-.76; Prevoznik Rule 30(b)(6) Dep. (Day 3) 1218:17-1219:10 (“Q. The DEA has certainly never issued any sort of guidance indicating that registrants must hold on to due diligence files for 15 years, correct? A. Yes. The only guidance I know is it’s two years, two years for recordkeeping for the registrant. ... Q. But there’s no requirement that a due diligence file even be maintained, correct? A. Correct. Q. So the two-year rule does not apply to any due diligence files, per se, correct? A. Correct. I was just pointing out that within the regs, there is records for a two-year period.”); Rannazzisi Dep. (Day 2) 555:7-11 (“Q. Is there any requirement in the DEA regulations or guidance to maintain due diligence documentation for a certain period of time? A. There’s no requirements.”); Wright Dep. (Day 1) 143:2-12 (“Okay. And the exercise that the registrant goes through to do some due diligence to really bear out whether the order is, in fact, truly a suspicious order or not, that due diligence exercise, is there a regulatory requirement to document that due diligence? . . . THE WITNESS: No.”); Wright Dep. (Day 2) 496:23-497:4 (Q. And it is the documentation of -- whatever due diligence is done by a company, that may be a best practice, but it is not required by statute or regulation, correct? . . . THE WITNESS: Yes, ma’am.”).

Charge of the El Paso Field Office, I supervised a diversion unit and reviewed any law enforcement activities they proposed. In my experience, the focus of diversion units prior to 2006 was on physically inspecting pharmacies to ensure that they were properly securing and accounting for prescription drug medications.

b) Requirements in Section 1301.74(b)

Section 1301.74(b) provides that a registrant “shall design and operate a system to disclose to the registrant suspicious orders of controlled substances.”⁵⁸ The regulation states that the “registrant shall inform the Field Division Office of the Administration in his area of suspicious orders when discovered by the registrant.”⁵⁹ While neither the CSA nor its regulations provide a definition for “suspicious order,” § 1301.74(b) states that a “suspicious order may include “orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency.”⁶⁰

It is important to understand what is not required by § 1301.74. There is no requirement in § 1301.74 that a registrant make a decision regarding the likelihood that a specific order will be diverted into illegitimate channels.⁶¹ There is no requirement in the regulation that a registrant decide if an order is actually “suspicious” as the public understands that word. It is also critical to understand that the regulation does not require registrants to stop or “block” orders that are “suspicious” under § 1301.74.”⁶² Nor does the regulation require a registrant to

⁵⁸ 21 C.F.R. § 1301.74(b).

⁵⁹ 21 C.F.R. § 1301.74(b).

⁶⁰ 21 C.F.R. § 1301.74(b). DEA witnesses have acknowledged that this is a subjective requirement and have been unable to provide comprehensive definitions for suspicious orders. Prevoznik Rule 30(b)(6) Dep. (Day 1) -185:2 (“Q. [I]s it fair to say then that the identification of suspicious orders can be a subjective process. ... A. Yeah, it can be subjective.”). At least one expert for Plaintiffs has agreed. James Rafalski (“Rafalski”) Dep. (Day 1) 404:23-405:2 (“Q. Can reasonable minds disagree about whether or not a particular order is suspicious? A. I think, yes, I would answer yes to that question.”).

⁶¹ 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 2) 534:4-24 (“Q. Okay. Now, in that section [21 C.F.R. § 1301.74], does the word or words ‘know your customer’ appear? A. No, ma’am. Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am. Q. Do the words ‘dispensing data’ appear in this regulation? A. No, ma’am. Q. Do the words ‘customer questionnaire’ appear in this regulation? A. No, ma’am. Q. Do the words ‘electronic order monitoring system’ appear in this regulation? A. No, ma’am. Q. Do the words ‘do not ship’ appear in this regulation? A. No, ma’am. Q. Do the word ‘dispensing data’ appear in this regulation? A. No, ma’am.”); Ashley Dep. 215:12-216:4 (“Q. Is [due diligence] explained in the federal regulation, [21 C.F.R. 1301.74]? ... A. No.”)

⁶² 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 2) at 534:19-21 (“Q. Do the words ‘do not ship’ appear in this regulation? A. No, ma’am.”); Prevoznik Rule 30(b)(6) Dep. (Day 3) 1154:7-11 (“Q. Mr. Prevoznik, I think we’ve already established that the regulation does not explicitly say do not ship orders that you report as suspicious, right? A. I agree with that....”).

use any particular system,⁶³ such as a manual or automated system,⁶⁴ or even have written policies or procedures with respect to that system.⁶⁵

There is also no requirement in § 1301.74(b) that a registrant must investigate orders that are “suspicious” under § 1301.74.⁶⁶ The regulation does not require or even mention “due diligence” or “investigation” of orders from customers that meet the regulatory definition of suspicious orders.⁶⁷ There is also no requirement in the regulation that a registrant must create or maintain “due diligence” files from any investigations that a registrant conducts on orders that a registrant identifies as meeting the definition of suspicious order.⁶⁸ The regulation makes no mention of “due diligence” files and it does not impose a requirement on how long any existing “due diligence” files must be retained by the registrant.⁶⁹ Other DEA retention requirements for

⁶³ 21 C.F.R. § 1301.74(b); Prevoznik Rule 30(b)(6) Dep. (Day 1) 180:7-10 (“Q. And the DEA leaves it up to the registrant to design a system that works with its own business model and customer base, correct? A. Correct.”)

⁶⁴ 21 C.F.R. § 1301.74(b); Prevoznik Rule 30(b)(6) Dep. (Day 1) 180:12-15 (“Q. Does it matter to the DEA whether a registrant reviews orders manually or uses an automated system? A. No, it doesn’t matter.”); Ashley Dep. 88:11-89:4 (“Q. To your knowledge, does a legally compliant system need to be automated? A. No, it does not.”).

⁶⁵ 21 C.F.R. § 1301.74(b); Prevoznik 30(b)(6) Dep. (Day 1) 358:21-359:1 (“Q. Does it say anywhere in the relevant regulations that registrants are required to have a written policy with respect to suspicious order monitoring? A. No.”).

⁶⁶ 21 C.F.R. § 1301.74(b).

⁶⁷ 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 2) 534:4-24 (“Q. Okay. Now, in that section [21 C.F.R. § 1301.74], does the word or words ‘know your customer’ appear? A. No, ma’am. Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am. Q. Do the words ‘dispensing data’ appear in this regulation? A. No, ma’am. Q. Do the words ‘customer questionnaire’ appear in this regulation? A. No, ma’am. Q. Do the words ‘electronic order monitoring system’ appear in this regulation? A. No, ma’am. Q. Do the words ‘do not ship’ appear in this regulation? A. No, ma’am. Q. Do the word ‘dispensing data’ appear in this regulation? A. No, ma’am.”); Ashley Dep. 215:12-216:4 (“Q. Is [due diligence] explained in the federal regulation, [21 C.F.R. 1301.74]? ... A. No.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 212:1-4 (“Q. Today, does the regulation explicitly reference knowing your customer? A. No.”).

⁶⁸ 21 C.F.R. § 1301.74(b); Prevoznik Rule 30(b)(6) Dep. (Day 3) 1218:17-1219:10 (“Q. The DEA has certainly never issued any sort of guidance indicating that registrants must hold on to due diligence files for 15 years, correct? A. Yes. The only guidance I know is it’s two years, two years for recordkeeping for the registrant. ... Q. But there’s no requirement that a due diligence file even be maintained, correct? A. Correct. Q. So the two-year rule does not apply to any due diligence files, per se, correct? A. Correct. I was just pointing out that within the regs, there is records for a two-year period.”); Rannazzisi Dep. (Day 2) 555:7-11 (“Q. Is there any requirement in the DEA regulations or guidance to maintain due diligence documentation for a certain period of time? A. There’s no requirements.”).

⁶⁹ 21 C.F.R. § 1301.74(b); Prevoznik Rule 30(b)(6) Dep. (Day 3) 1218:17-1219:10 (“Q. The DEA has certainly never issued any sort of guidance indicating that registrants must hold on to due diligence files for 15 years, correct? A. Yes. The only guidance I know is it’s two years, two

registrants, found in the CSA⁷⁰ and in 21 C.F.R. § 1304.04,⁷¹ are limited to retaining inventory and other records related to inventory for two years.

6. Lack of Clarity Regarding What Constitutes a Suspicious Order under Section 1301.74(b).

Under § 1301.74(b), “[s]uspicious orders” are defined to “include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency.”⁷² What constitutes a suspicious order under § 1301.74(b) is unclear, and the regulation fails to provide sufficient guidance to registrants.⁷³ No definition of “unusual size” is offered in the regulation.⁷⁴ The regulation also fails to provide guidance as to how a registrant can determine if an order is

years for recordkeeping for the registrant. ... Q. But there's no requirement that a due diligence file even be maintained, correct? A. Correct. Q. So the two-year rule does not apply to any due diligence files, per se, correct? A. Correct. I was just pointing out that within the regs, there is records for a two-year period.”); Rannazzisi Dep. (Day 2) 555:7-11 (“Q. Is there any requirement in the DEA regulations or guidance to maintain due diligence documentation for a certain period of time? A. There's no requirements.”).

⁷⁰ 21 U.S.C. § 827(b) (“Every inventory or other record required under this section (1) shall be in accordance with, and contain such relevant information as may be required by, regulations of the Attorney General, ... and (3) shall be kept and be available, for at least two years, for inspection and copying by officers or employees of the United States authorized by the Attorney General.”).

⁷¹ 21 C.F.R. § 1304.04(a) (“... [E] every inventory and other records required to be kept under this part must be kept by the registrant and be available, for at least 2 years from the date of such inventory or records”).

⁷² 21 C.F.R. § 1301.74(b).

⁷³ Prevoznik Rule 30(b)(6) Dep. (Day 3) 897:10-23 (“Q. Okay. And I want to make sure that your testimony is clear. When you say whether a suspicious order is subjective, do you mean that it varies from case to case, or it depends on who's looking at it? ... [A.] Both, really. It depends who's looking at it and what system do they have that's triggering the suspicious order. So it's whatever that registrant designed, which is specific to that registration.”).

⁷⁴ Ashley Dep. 146:21-147:11 (“[Q.] What about unusual in Section B, what is meant by unusual size? A. It would be different from the norm of the size that that particular customer typically orders. Q. Different from the norm. So how much of a deviation would make it unusual? A. That would be determined by the distributor or the manufacturer. Q. So is there any threshold for determining whether a deviation is unusual? A. Not that the DEA sets, no. Q. Based on your experience, would you agree that there might be situations where an order is of an unusual size, but the order is not suspicious? A. Yes.”).

“unusual size.”⁷⁵ Determining whether an order is of “unusual size” is a subjective determination,⁷⁶ and for example, the determination can vary depending on if the comparison is:

- “An order of unusual size compared to orders of other customers”;
- “An order of unusual size compared to orders of a certain subset of customers”; and
- “An order of unusual size compared to that particular customer’s historical orders.”

DEA offers no guidance to registrants in the regulation on the comparison that should be used by registrants in determining whether an order is of “unusual size.”⁷⁷ “Unusual size” is also ambiguous because DEA fails to provide guidance as to what level quantitative change constitutes an order of unusual size.⁷⁸ The regulation provides no guidance, for example, on whether a 10% increase is “unusual,” a 50% increase is “unusual,” or if a 100% increase is

⁷⁵ 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 2) 535:11-18 (“Q. The phrase ‘unusual size,’ does this regulation do anything more to explain what ‘unusual size’ could mean? A. The regulation is ‘of unusual size.’ That’s all it says. Q. So it doesn’t do anything to further explain what ‘unusual size’ means, correct? A. No.”); Ashley Dep. 26:16-19 (“Q. Does the regulation … provide guidance as to what constitutes an order of unusual size? A. No.”).

⁷⁶ Prevoznik Rule 30(b)(6) Dep. (Day 3) 897:10-23 (“Q. Okay. And I want to make sure that your testimony is clear. When you say whether a suspicious order is subjective, do you mean that it varies from case to case, or it depends on who’s looking at it? … [A.] Both, really. It depends who’s looking at it and what system do they have that’s triggering the suspicious order. So it’s whatever that registrant designed, which is specific to that registration.”).

⁷⁷ Rannazzisi Dep. (Day 2) 535:11-18 (“Q. The phrase ‘unusual size,’ does this regulation do anything more to explain what ‘unusual size’ could mean? A. The regulation is ‘of unusual size.’ That’s all it says. Q. So it doesn’t do anything to further explain what ‘unusual size’ means, correct? A. No.”); Ashley Dep. 26:16-19 (“Q. Does the regulation … provide guidance as to what constitutes an order of unusual size? A. No.”).

⁷⁸ Rannazzisi Dep. (Day 2) 535:11-18 (“Q. The phrase ‘unusual size,’ does this regulation do anything more to explain what ‘unusual size’ could mean? A. The regulation is ‘of unusual size.’ That’s all it says. Q. So it doesn’t do anything to further explain what ‘unusual size’ means, correct? A. No.”); Ashley Dep. 26:16-19 (“Q. Does the regulation … provide guidance as to what constitutes an order of unusual size? A. No.”).

“unusual.”⁷⁹ DEA additionally offers no guidance in helping registrants determine whether an order is suspicious.⁸⁰ Furthermore, large orders are not necessarily indicative of diversion.⁸¹

The same lack of clarity attaches to “orders deviating substantially from a normal pattern” and “orders of unusual frequency.”⁸² The regulations and guidance do not define and provide no explanation for how to determine if an order is “deviating substantially” from a “normal pattern.”⁸³ There is also no definition of or guidance regarding how a registrant should define a “normal pattern,” including whether “normal” is defined in comparison of orders for that particular customer, a subset of the registrant’s customers, or the registrant’s entire customer base.⁸⁴ The regulation also does not define what types of changes with respect to a customer ordering “new” types of pharmaceutical products constitutes a substantial deviation from a normal pattern.⁸⁵

⁷⁹ 21 C.F.R. § 1301.74(b).

⁸⁰ Prevoznik Rule 30(b)(6) Dep. 292:22-293 (“Q. ...[I]f a registrant came to you today and said I am trying to decide whether this order is suspicious, am I correct that the DEA's policy is that the DEA will not provide a yes or no answer to that question? ... A. I would be extremely concerned if you as a registrant came to me and asked me to make that determination. Because you are basically telling me that you -- you do not have the ability to effectively -- to maintain effective guards against diversion if you're coming to us with that hypothetical. Which would be grounds for us to revoke your registration.”); Rannazzisi Dep. (Day 1) 43:13-23 (“Q. So it was DEA's policy not to tell registrants that an order is suspicious? ... A. It was a business decision that would be made by the distributor whether an order was suspicious.”).

⁸¹ Patrick Leonard (“Leonard”) Dep. (Day 3) 427:14-428:2 (“Q. Have you ever started an investigation related to diversion based solely on the volume of prescription opioids being dispensed. A. No. There's always more factors that are looked at before an investigation is opened. Q. Volume alone can't tell you that something is necessarily wrong? A. No.”); Lori Baker-Stella (“Baker-Stella”) Dep. (Day 2) 413:5-19 (“Q. My question is, the number of prescriptions alone is not enough to reach a judgment on whether there's overprescribing or not? A. Yes. Q. Have you ever requested a search warrant for a doctor based solely on the amount of prescriptions that the doctor was writing? A. I don't believe I have”).

⁸² 21 C.F.R. § 1301.74(b).

⁸³ Rannazzisi Dep. (Day 1) 277:8-22 (“Q. So let me come back to -- to this -- so you gave me your elaboration and further definition of some of the terminology in 21 C.F.R. 1301.74, right? A. Yes. Q. But your elaboration, your further definition of unusual size, pattern, frequency, that's not in the regulation itself, right? ... [A.] No. ... No, it's not in the regulation.”).

⁸⁴ 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 1) 277:8-22 (“Q. So let me come back to -- to this -- so you gave me your elaboration and further definition of some of the terminology in 21 C.F.R. 1301.74, right? A. Yes. Q. But your elaboration, your further definition of unusual size, pattern, frequency, that's not in the regulation itself, right? ... [A.] No. ... No, it's not in the regulation.”).

⁸⁵ Rannazzisi Dep. (Day 1) 262:22-263:5.

Similarly, the DEA failed to provide sufficient guidance to determine “orders of unusual frequency.” DEA again failed to explain whether “unusual frequency” involves a comparison to prior orders of that particular customer, a certain subset of that registrant’s customers, or a comparison to that registrant’s entire customer base. The regulation also fails to provide guidance on what types of changes in order frequency rise to the level of “unusual frequency.”⁸⁶ DEA also failed to provide guidance as to the potential overlap between whether an order is of “unusual size,” “deviating substantially” from a normal pattern, or an order of “unusual frequency.”⁸⁶ In fact, Mr. Rannazzisi testified that during his tenure as the head of the Office of Diversion Control, DEA lacked internal guidance as to what orders constituted “suspicious orders” under the regulation.⁸⁷

Around the time of the Distributor Initiative, the lack of clarity in the regulation and the lack of guidance from DEA on the definition on “suspicious orders” resulted in confusion among registrants and led to complaints from registrants on the lack of DEA guidance.⁸⁸ This confusion could have been alleviated but for, as discussed in the December 2007 letter from Mr.

⁸⁶ Rannazzisi Dep. (Day 1) at 272:22-273:9.

⁸⁷ Rannazzisi Dep. (Day 1) 317:12-22 (“Q. And for clarity, let me focus you on time periods with that same question. Let’s say from the 2005 through the time you left DEA in 2016, that is the time period, in that time period of 2005 to 2016, yes or no, did DEA have internal guidance as to what constitutes a suspicious order? ...[A.] No.”).

⁸⁸ Ashley Dep. 58:23-59:6 (“Q. At any time during your tenure at the DEA, did you learn that the distributors were confused about their suspicious order regulations and wanted more guidance from the DEA? A. I can say in speaking with distributors, they expressed that they wanted more clarification. Q. And so you heard that directly from the distributors? A. Yes.”); Wright Dep. (Day 1) 120:12-121:3 (“Q. But you did recognize -- and I think your testimony at trial supports this concept -- you recognized that this change from the Excessive Order System to the Suspicious Order System, which was more fluid, would cause confusion in the industry, correct? A. Yes. Q. And that was part of the reason you wanted to do these distributor briefings and go one on one with distributors, right? A. Yes. Q. And there was also concern, as I saw from your prior testimony, that your own DEA agents might be confused by the -- the changes going on within the industry, correct? ... A. Yes.”). United States Government Accountability Office, “Prescription Drugs: More DEA Information about Registrants’ Controlled Substances Roles Could Improve Their Understanding and Help Ensure Access (2015) (“2015 GAO Report”) at 43 (“... [A]dequate DEA communication with and guidance for its registrants are essential to help ensure that registrants take actions that prevent abuse and diversion but do not unnecessarily diminish patients’ access to controlled substances for legitimate use because of their uncertainty about how to appropriately meet their CSA roles and responsibilities. ... [S]ome ... stakeholders said they needed improved communication and guidance regarding registrants’ roles and responsibilities for preventing abuse and diversion under the CSA. ... While providing additional guidance to registrants—particularly distributors and pharmacies—about their CSA roles and responsibilities cannot ensure that registrants are meeting them, by doing so DEA will have a greater assurance that registrants understand their CSA responsibilities.”).

Rannazzisi,⁸⁹ DEA's policy not to advise when to file a suspicious order⁹⁰ and not to approve suspicious order monitoring programs.⁹¹ Registrants repeatedly sought clarification concerning, among other things, the meaning of "suspicious order," due diligence, and how registrants should "know your customer" from DEA.⁹² One reason why DEA did not provide clarification was because of litigations involving registrants and/or investigation of registrants.⁹³ Additionally, because of the changing drugs of interest, diversion tactics and other variables, DEA did not want to provide guidance.⁹⁴ Despite requests from industry, DEA consistently refused to provide

⁸⁹ CAH_MDL_PRIORPROD_DEA12_00010980, 10980 ("DEA does not approve or otherwise endorse any specific system for reporting suspicious orders. Past communications with DEA, whether implicit or explicit, that could be construed as approval of a particular system for reporting suspicious orders, should no longer be taken to mean that DEA approves a specific system.").

⁹⁰ Rannazzisi Dep. (Day 1) 45:19-46:7 ("A. It's DEA's policy that they do not advise when to ship or when to file a suspicious orders. That's a business decision that, under the regulations, is maintained by the .. distributor. Q. And this was the policy at DEA the entire time that you were the head of the Office of Diversion Control, correct? ... [A.] It was the policy of the agency.")

⁹¹ Rannazzisi Dep. (Day 1) 42:17-23 ("Q. But isn't it true that you affirmatively stated that it was DEA's policy not to approve any suspicious order monitoring programs? A. That was the position of the agency. And yes, that was stated in at least two of my letters to industry."), 282:4-8 ("Q. Well, let me ask it this way: Has DEA provided in written form your explanation and elaboration of what a suspicious order is to registrants? A. Not as far as I'm aware.").

⁹² June 1, 2011 HDMA Letter to DEA, "Questions for the Drug Enforcement Administration (DEA) Regarding Requirements for Suspicious Orders Monitoring and Reporting Submitted by the Healthcare Distribution Management Association (HDMA) (US-DEA-00008565-76), at 1-2, 6, 9; July 2, 2013 HDMA Letter to DEA, "Questions for the Drug Enforcement Administration (DEA) by the Healthcare Distribution Management Association (HDMA) Submitted July 2, 2013 for Discussion July 31, 2013," (US-DEA-00008577-83), at 1-2, 5.

⁹³ Prevoznik Rule 30(b)(6) Dep. (Day 1) 200:24-201:15 ("Q. ... This morning you told me that for the 2010-2013 time period, because of litigation and other things, there were not necessarily briefings or distributor conferences held in that time period correct? A. There were -- we had stopped with the distributor initiative and we had stopped with the conferences with the wholesalers, yes. Q. In 2010 to 2013? A. Right. Q. And you told me the main reason was because of litigation and investigations, right? A. Correct.").

⁹⁴ Wright Dep. (Day 1) 106:6-22 ("It couldn't provide [guidance]. Because it is fluid, and there are too many variables, too many anomalies, too many situations. And what is the drug tomorrow? What is the problem tomorrow? Right now we started this internet with Hydrocodone. You tell me what the problem is today . . ."), 118:11-119:3 ("Fentanyl. We went from Hydrocodone to oxycodone, twice as potent, to fentanyl that is now dealing with micrograms. It is just so in - small, extremely, extremely potent. Their system - what was in Excessive was rigid. This is all you do. Under Suspicious this is the - there's too many variables. What is it? What is happening in Alaska? What's the drug of choice? Why? Compared to West Virginia, compared to Florida, compared to all the other - you have to look at all of this. And I can't. And DEA can't sit there and say, 'Oh, yeah. That works.' And then

additional guidance.⁹⁵ This lack of guidance was particularly problematic given that registrants were tasked with identifying suspicious orders during a time period when opioid prescriptions and the DEA's opioid quotas were increasing year after year.

7. Lack of Sufficient Guidance from DEA on Regulatory Requirements

DEA's refusal to provide guidance to industry on the definition of "suspicious order" and other topics resulted in the US Government Accountability Office issuing a report critical of DEA's responsiveness. In the report, GAO's "Recommendations for Executive Action" included the instruction that DEA "[s]olicit input from distributors, or associations representing distributors, and develop additional guidance for distributors regarding their roles and responsibilities for suspicious orders monitoring and reporting."⁹⁶ The GAO further noted in its report that "although DEA may not be able to provide guidance that will definitively answer the question of what constitutes a suspicious order or offer advice about which customers to ship to, DEA could, for example, provide guidance around best practices in developing suspicious orders monitoring systems."⁹⁷

The Acting Administrator Chuck Rosenberg of DEA recognized DEA's lack of responsiveness to the questions and concerns of registrants in testimony before Congress. Specifically, Chuck Rosenberg testified "[a]nd we've been opaque. I think we've been slow. I think we've been opaque. I think we haven't responded to them. We're trying to issue guidelines more quickly. We're trying to answer their questions."⁹⁸ Similarly, Keith Martin, the ASAC in charge of the Cleveland DEA Office, testified that he would not know how a registrant would detect a suspicious order.⁹⁹ DEA's refusal to provide requested guidance to registrants on suspicious order monitoring and the definition of "suspicious order" hurt anti-diversion activities and resulted in confusion among registrants.

VII. THE EMERGENCE OF NEW DIVERSION TRENDS AND DEA'S RESPONSE

While I served as the Deputy Special Agent in Charge of the DEA's Miami Field Division from 2006-2007, I received weekly reports from the diversion program manager, commonly known as the DPM, of the DEA's diversion control group in Florida. At the time, the

people migrate, economies change, so many factors coming. And if you're not ready to adapt to that, then you don't have a system.").

⁹⁵ June 22, 2016 Email from L. Milione to D. Ashley, "Follow-Up from HDA Board Meeting, at 1 (US-DEA-00008563-64); Wright Dep. (Day 1) 103:1-4 ("Q. Were you aware of some sort of guidance that issued from DEA about the Suspicious Ordering System? A. Not to my recollection.").

⁹⁶ 2015 GAO Report at 44.

⁹⁷ 2015 GAO Report at 27.

⁹⁸ Tr. of Senate Judiciary Hearing on DEA Oversight, Testimony of Chuck Rosenberg at 30 (June 22, 2016).

⁹⁹ Martin Dep. 218:3-21.

diversion control group's primary focus was an unprecedented growth in diversion by rogue internet pharmacies.¹⁰⁰

Some of the rogue internet pharmacies (and pill mills) were DEA registrants, and, therefore, within the CSA's "closed system."¹⁰¹ The diversion control group and special agents in Florida conducted investigations of internet pharmacies to determine whether they were breaking the law and brought criminal charges or sought immediate suspension orders where appropriate. I understand that rogue internet pharmacies were not unique to Florida, and the scale of the problem placed pressure on DEA's Office of Diversion Control to go outside the normal investigative and enforcement methods to address the new diversion trends.

On September 27, 2006, Joseph Rannazzisi, Deputy Assistant Administrator of the Office of Diversion Control, sent a letter to distributor registrants.¹⁰² Mr. Rannazzisi stated, "DEA recognizes that the overwhelming majority of registered distributors act lawfully and take appropriate measures to prevent diversion."¹⁰³ This was consistent with DEA's belief that the major distributors were complying with their obligations. DEA recognized that "all registrants - manufacturers, distributors, pharmacies, and practitioners - share responsibility for maintaining appropriate safeguards against diversion."¹⁰⁴ Mr. Rannazzisi went on to write that the "maintenance of effective controls against diversion" language found in 21 U.S.C. § 823 creates a requirement that distributors "exercise due diligence to avoid filling suspicious orders that might be diverted into other than legitimate medical, scientific, and industrial channels" and "exercise due care in confirming the legitimacy of all orders prior to filling."¹⁰⁵ Mr. Rannazzisi

¹⁰⁰ Prevoznik Rule 30(b)(6) Dep. (Day 1) 151:13-17 ("So it really changed the dynamic of diversion when it went to the internet."), 281:16-21 ("[Y]ou can go back to the internet days when ... the pattern was all of the sudden products that were skyrocketing to the millions and hundreds of thousands that were never there."), 298:4-9 ("Back in 2005 when we started, that was when we were addressing the internet."); Rannazzisi Dep. (Day 1) 198:18-22 ("[W]e tried to focus on where the threat was and at that point in time [2005-2008], we had threats but it just seemed that the vast majority of the cases were Internet-based."); US-DEA-00004802 at slides 3 (describing emergence of diversion via the internet), 8 (contrasting "Cyber [Pharmacy] vs. Brick & Mortar [Pharmacy] Sales"); US-DEA-00020544, 20551 ("Between fiscal years 2006 and 2009, rogue Internet pharmacies were a major source of diversion.").

¹⁰¹ Rogue Online Pharmacies: The Growing Problem of Internet Drug Trafficking, Hearing Before the S. Comm. on the Judiciary, 110th Cong., 110-472 (May 16, 2007) (testimony of Joseph Rannazzisi, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Administration) at 18 ("MR. RANNAZZISI: ... I can tell you that we have been shutting these [rogue internet] pharmacies down using our regulatory authority and immediate suspension authority. We have gone after them and immediately taken their registration so they cannot dispense and procure controlled substances.")

¹⁰² MCKMDL00478906

¹⁰³ MCKMDL00478906, 478907.

¹⁰⁴ MCKMDL00478906, 478907.

¹⁰⁵ MCKMDL00478906, 478907.

further stated that a registrant “may not simply rely on the fact that the person placing the suspicious order is a DEA registrant,” but must investigate any “suspicious circumstances.”¹⁰⁶

As discussed above, the CSA and its implementing regulations do not state that a registrant must conduct “due diligence” or investigate their customers, or refrain from shipping “suspicious orders” that they reported to DEA.¹⁰⁷ Mr. Rannazzisi’s September 27, 2006 letter did not change the regulations. Instead, it vaguely implied that DEA was interpreting the CSA to require registrants to not ship some “suspicious orders” “that might be diverted into other than legitimate medical, scientific, and industrial channels.” The letter also stated that registrants should “exercise due diligence” and “exercise due care in confirming the legitimacy of all orders prior to filling.”¹⁰⁸ In other words, Mr. Rannazzisi’s letter began the process of shifting expectations beyond the applicable regulations. This direction was not, however, expressed in clear or formal guidance and the DEA’s primary focus, as expressed to registrants, was in addressing rogue internet pharmacies.

By its terms, the Controlled Substances Act imposed a duty on registrants within the closed system to take appropriate steps, as specified by DEA regulations, to ensure the safety and security of controlled substances while those substances are under the custody and control of the registrant.¹⁰⁹ Apart from requiring the registrant to make a good faith effort to ensure that its customer was properly registered (and thus, part of the closed system over which DEA has control),¹¹⁰ the CSA and its implementing regulations imposed no obligation on registrants to prevent “downstream diversion” (i.e., diversion of controlled substances after such substances left the custody and control of the registrant) by investigating other registrants.¹¹¹ The regulation

¹⁰⁶ MCKMDL00478906, 478907.

¹⁰⁷ 21 C.F.R. § 1301.74(b); Rannazzisi Dep. (Day 2) 534:4-9 (“Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am.”), 534:19-21 (“Q. Do the words “do not ship” appear in this regulation? A. No, ma’am.”); Ashley Dep. 215:12-216:4 (“Q. Is [due diligence] explained in the federal regulation, [21 C.F.R. 1301.74]? ... A. No.”); Prevoznik Rule 30(b)(6) Dep. (Day 3) 1154:7-11 (“Q. Mr. Prevoznik, I think we’ve already established that the regulation does not explicitly say do not ship orders that you report as suspicious, right? A. I agree with that....”).

¹⁰⁸ MCKMDL00478906, 478907.

¹⁰⁹ 21 U.S.C. § 823; 21 C.F.R. § 1301.71-.76; Rannazzisi Dep. (Day 2) 528:9-530:16 (testifying that requirements identified in September 2006 and December 2007 letters are not contained in the CSA).

¹¹⁰ 21 C.F.R. § 1301.74(a).

¹¹¹ 21 U.S.C. § 823; 21 C.F.R. § 1301-71-76; Rannazzisi Dep. (Day 2) 534:4-24 (“Q. Okay. Now, in that section [21 C.F.R. § 1301.74], does the word or words ‘know your customer’ appear? A. No, ma’am. Q. Do the words ‘due diligence’ appear in this regulation? A. No, ma’am. Q. Do the words ‘dispensing data’ appear in this regulation? A. No, ma’am. Q. Do the words ‘customer questionnaire’ appear in this regulation? A. No, ma’am. Q. Do the words ‘electronic order monitoring system’ appear in this regulation? A. No, ma’am. Q. Do the words ‘do not ship’ appear in this regulation? A. No, ma’am. Q. Do the word ‘dispensing data’ appear

does not state that registrants must create or maintain “due diligence” files on any investigations of “suspicious orders” they identify.¹¹² The standards articulated in Mr. Rannazzisi’s letter are not contained in the CSA or any DEA regulations interpreting the CSA.¹¹³

The September 2006 letter also contains a list of questions that a distributor registrant “may wish to inquire with the ordering pharmacy about.”¹¹⁴ These questions were focused on issues that had arisen in the context of rogue internet pharmacies. The list of questions seek information that DEA—in my experience—would attempt to obtain using law enforcement powers while building a criminal case against a registrant. For example, while it is illegal for a pharmacy “to sell controlled substances without a prescription,” it is very unlikely that another registrant could determine whether a pharmacy was engaged in that conduct without using informants or engaging in undercover work. Given this context, it appears that DEA was attempting to shift its law enforcement role to registrants who did not have at their disposal the many investigatory tools available to DEA, such as administrative subpoenas, search warrants, wire taps, undercover personnel to conduct surveillance, or the ability to seize records and computers.¹¹⁵

On December 27, 2007, Mr. Rannazzisi sent another letter to registrants.¹¹⁶ In the letter, Mr. Rannazzisi referenced the suspicious order reporting requirement found in 21 C.F.R. § 1301.74(b) and wrote that “Registrants must conduct an independent analysis of suspicious orders prior to completing a sale to determine whether the controlled substances are likely to be diverted from legitimate channels.”¹¹⁷ Neither 21 U.S.C. § 823 nor 21 C.F.R. § 1301.71-76 state that a registrant is required to conduct an “independent analysis” of “suspicious orders” prior to

in this regulation? A. No, ma'am.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 212:1-4 (“Q. Today, does the regulation explicitly reference knowing your customer? A. No.”).

¹¹² 21 C.F.R. §§ 1301.71-.76; Prevoznik Rule 30(b)(6) Dep. (Day 3) 1218:17-1219:10 (“Q. The DEA has certainly never issued any sort of guidance indicating that registrants must hold on to due diligence files for 15 years, correct? A. Yes. The only guidance I know is it's two years, two years for recordkeeping for the registrant. ... Q. But there's no requirement that a due diligence file even be maintained, correct? A. Correct. Q. So the two-year rule does not apply to any due diligence files, per se, correct? A. Correct. I was just pointing out that within the regs, there is records for a two-year period.”); Rannazzisi Dep. (Day 2) 555:7-11 (“Q. Is there any requirement in the DEA regulations or guidance to maintain due diligence documentation for a certain period of time? A. There's no requirements.”).

¹¹³ 21 U.S.C. § 823; 21 C.F.R. § 1301.71-76

¹¹⁴ MCKMDL00478906, 478908.

¹¹⁵ Martin Dep. 221:15-224:3 (describing various law enforcement powers available to DEA and confirming distributors and manufacturers are not empowered to use same because “[i]t's the job of law enforcement”).

¹¹⁶ CAH_MDL_PRIORPROD_DEA12_00010980.

¹¹⁷ CAH_MDL_PRIORPROD_DEA12_00010980, 10980.

completing a sale of controlled substances to a DEA-registered customer.¹¹⁸ This was the first time this guidance had been stated in a written communication to registrants from DEA, although some of the concepts had been previewed to the industry by Michael Mapes, Chief, DEA, Regulatory Section, and Chris Zimmerman, Vice President, Amerisource Bergin, at the DEA's Pharmaceutical Industry Conference on September 11-12, 2007.¹¹⁹ There, DEA introduced "new customer due diligence" concepts, including "Know Your Customer" and "Do Not Ship."¹²⁰ DEA explained that "[r]eporting suspicious orders to DEA does NOT relieve the distributor of the responsibility to maintain effective controls to prevent diversion," "DEA cannot/will not tell a distributor: if an order is or is not legitimate; and/or if the distributor should or should not ship an order," and "Distributor must make a 'business' decision whether or not to ship the order."¹²¹ DEA further explained that "'Know Your Customer' Due Diligence investigations [should be] completed on all new Retail and Wholesale Accounts" and "Retail chain pharmacies are exempted."¹²² Amerisource Bergin and DEA explained that "[h]istorically Controlled Substance / Listed Chemical order monitoring has been based on a ship and report process," but new processes "[should] now [be] based on: identify, capture, investigate, and report suspicious orders; all **prior to shipment.**"¹²³

Mr. Rannazzisi also wrote in the December 2007 letter that "registrants that routinely report suspicious orders, yet fill these orders without first determining that order is not being diverted into other than legitimate medical, scientific, and industrial channels, may be failing to maintain effective controls against diversion."¹²⁴ Neither 21 U.S.C. § 823 nor 21 C.F.R. § 1301.71-76 state that a registrant is required to investigate a "suspicious order" prior to shipping.¹²⁵

¹¹⁸ 21 U.S.C. § 823; 21 C.F.R. § 1301.71-76; Rannazzisi Dep. (Day 2) 528:9-530:16 (testifying that requirements identified in September 2006 and December 2007 letters are not contained in the CSA).

¹¹⁹ Prevoznik Rule 30(b)(6) Dep. (Day 3), Ex. 29.

¹²⁰ Prevoznik Rule 30(b)(6) Dep. (Day 3), Ex. 30 (ABDCMDL00037184 at ABDCMDL00037190).

¹²¹ Prevoznik Rule 30(b)(6) Dep. (Day 3), Ex. 30 (ABDCMDL00037184 at ABDCMDL00037188).

¹²² Prevoznik Rule 30(b)(6) Dep. (Day 3), Ex. 30 (ABDCMDL00037184 at ABDCMDL00037190) (emphasis added).

¹²³ Prevoznik Rule 30(b)(6) Dep. (Day 3), Ex. 30 (ABDCMDL00037184 at ABDCMDL00037192) (emphasis in original).

¹²⁴ CAH_MDL_PRIORPROD_DEA12_00010980, 10981.

¹²⁵ 21 U.S.C. § 823; 21 C.F.R. § 1301.71-76; Rannazzisi Dep. (Day 2) 528:9-530:16 (testifying that requirements identified in September 2006 and December 2007 letters are not contained in the CSA); Prevoznik Rule 30(b)(6) Dep. (Day 1) 167:5-12 ("Q. Did the Controlled Substances Act contain any language that states whether or not a distributor could ship a suspicious order? A. It doesn't say specifically that. It does say that it needs to be -- it has to maintain -- maintain effective control against diversion."), 303:19-304:1 ("Q. You would agree with me that the

Mr. Rannazzisi also used the December 2007 letter to disavow earlier guidance and approvals that DEA had provided to registrants regarding their suspicious order monitoring by including the following statement: “DEA does not approve or otherwise endorse any specific system for reporting suspicious orders. Past communications with DEA, whether implicit or explicit, that could be construed as approval of a particular system for reporting suspicious orders, should no longer be taken to mean that DEA approves a specific system.”¹²⁶

As with the September 2006 letter, the standards articulated in Mr. Rannazzisi’s December 2007 letter are not contained in the CSA or any DEA regulations interpreting the CSA.¹²⁷

The investigatory standards articulated in both the September 2006 and December 2007 letters, including the shifting of investigatory responsibilities described above, are inconsistent with my understanding of the role of DEA and registrants. Historically, DEA conducted investigations to identify registrants that were diverting from the “closed system” and sought to remove their registrations in order to maintain the integrity of the system. Registrants were not expected to create private law enforcement teams—without actual law enforcement powers—to replace DEA’s special agents and their enforcement powers.¹²⁸

VIII. OPTIONS AVAILABLE TO ENHANCE DEA’S REGULATORY AND ENFORCEMENT EFFORTS

There were multiple legitimate options for enhancing DEA’s regulatory and enforcement efforts in response to emerging drug diversion trends that did not require introducing new standards not contained within the CSA or DEA regulations interpreting the CSA.

A. DEA can request changes to laws

Congress—on its own or at the request of DEA, the President, the Attorney General, or another party—could have changed the CSA to expand the duties of registrants. DEA maintains an Office of Congressional Affairs, whose sole purpose to be the “primary point of contact for all communications and interactions with Members of Congress and their staffs.”¹²⁹

statute itself does not contain the express instruction that a registrant should hold an order and not ship it if it determines it to be suspicious, correct? A. Correct.”).

¹²⁶ CAH_MDL_PRIORPROD_DEA12_00010980, 10980.

¹²⁷ 21 U.S.C. § 823; 21 C.F.R. § 1301.71-76; Rannazzisi Dep. (Day 2) 528:9-530:16 (testifying that requirements identified in September 2006 and December 2007 letters are not contained in the CSA).

¹²⁸ Martin Dep. 221:15-224:3 (describing various law enforcement powers available to DEA and confirming distributors and manufacturers are not empowered to use same because “[i]t’s the job of law enforcement”).

¹²⁹ Drug Enforcement Administration, Congressional Affairs, <https://www.dea.gov/congressional-affairs> (last visited May 25, 2019).

Congress has acted before to change the CSA to address new drug abuse trends. For example, in 2000, Congress passed the Hillary J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000 in response to concerns that “[g]amma hydroxybutyric acid … [had] become a significant and growing problem in law enforcement.”¹³⁰ In the Bill, Congress directed DEA to schedule gamma hydroxybutyric acid as a List I Chemical¹³¹ and amended the CSA to grant DEA authority to write new regulations for the reporting of transactions by registrants¹³² and to create “a special unit which shall assess abuse of and trafficking in gamma hydroxybutyric acid, flunitrazepam, ketamine, other controlled substances, and other so-called ‘designer drugs’ whose use has been associated with sexual assault.”¹³³

As another example, in 2008, Congress passed the Ryan Haight Online Pharmacy Consumer Protection Act of 2008 to address online pharmacies in response to the issues with rogue internet pharmacies described above.¹³⁴ This act amended portions of the CSA to address concerns related to internet pharmacies.¹³⁵ Within 6 months of passage of the act, DEA implemented new interim regulations to advise registrants on the new requirements included in the act.¹³⁶

As yet another example, in 1996, Congress passed the Comprehensive Methamphetamine Control Act because “[t]he abuse of methamphetamine ha[d] increased dramatically since 1990.”¹³⁷ This act amended portions of the CSA to address the manufacture, distribution, and sale of precursor chemicals¹³⁸ and directed the establishment of a “suspicious order task force” to develop “proposals to define suspicious orders of listed chemicals, and particularly to develop

¹³⁰ H.R. 2130, 106th Cong. § 2 (2000).

¹³¹ H.R. 2130, 106th Cong. § 3 (2000).

¹³² H.R. 2130, 106th Cong. § 4 (2000).

¹³³ H.R. 2130, 106th Cong. § 8 (2000).

¹³⁴ H.R. 6253, 110th Cong. (2008).

¹³⁵ H.R. 6253, 110th Cong. (2008); Drug Enforcement Administration, Implementation of the Ryan Haight Online Pharmacy Consumer Protection Act of 2008, 74 Fed. Reg. 15596, 15596 (Apr. 6, 2009) (“The Ryan Haight Online Pharmacy Consumer Protection Act, which was enacted on October 15, 2008, amended the Controlled Substances Act and Controlled Substances Import and Export Act by adding several new provisions to prevent the illegal distribution and dispensing of controlled substances by means of the Internet.”).

¹³⁶ Drug Enforcement Administration, Implementation of the Ryan Haight Online Pharmacy Consumer Protection Act of 2008, 74 Fed. Reg. 15596, 15596 (Apr. 6, 2009) (“DEA is hereby issuing an interim rule to amend its regulations to implement the legislation and is requesting comments on the interim rule.”).

¹³⁷ S. 1965, 104th Cong. § 2 (1996).

¹³⁸ S. 1965, 104th Cong. § 401 (1996).

quantifiable parameters which can be used by registrants in determining if an order is a suspicious order which must be reported to DEA.”¹³⁹

In response to concerns that prescription drug diversion was a significant and growing problem in law enforcement, Congress could have, but did not, amend the CSA to introduce any new standards regarding due diligence by registrants, reporting of suspicious orders, or shipping of suspicious orders necessary to “maintain effective controls.”¹⁴⁰

B. DEA can write new regulations

To the extent DEA wanted the statements in the September 2006 and December 2007 letters to be new standards authorized by the existing CSA,¹⁴¹ the DEA could have written new regulations that clearly described the rules to registrants.¹⁴² As part of writing new rules, the rules would have been subject to notice and comment regarding their clarity and usefulness in combating diversion,¹⁴³ and if the regulations exceeded the statutory authority granted to DEA by Congress, they could have been challenged in court by the affected parties. However, it is my understanding that DEA has not released any new regulations regarding due diligence by registrants, reporting of suspicious orders, or shipping of suspicious orders since the original regulations were released in 1971.¹⁴⁴ DEA never released any new regulations that incorporated the standards set forth in the September 2006 and December 2007 letters.¹⁴⁵

1. Suspicious Activity Reports

In contrast to the minimal guidance offered to registrants and the ever-changing landscape of DEA expectations with respect to the SOM requirement, other regulated industries benefit from clearer expectations and significant detail on what is required. By way of example,

¹³⁹ S. 1965, 104th Cong. § 504 (1996).

¹⁴⁰ 21 U.S.C. § 823.

¹⁴¹ MCKMDL00478906, 478907 (“to maintain effective controls against diversion as section 823(e) requires, the distributor should exercise due care in confirming the legitimacy of all orders prior to filling”); CAH_MDL_PRIORPROD_DEA12_00010980, 10981 (“registrants that routinely report suspicious orders, yet fill these orders without first determining that order is not being diverted into other than legitimate medical, scientific, and industrial channels, may be failing to maintain effective controls against diversion. Failure to maintain effective controls against diversion is inconsistent with the public interest as that term is used in 21 USC 823 and 824”).

¹⁴² 21 U.S.C. § 821 (granting Attorney General authority to write rules regarding manufacture, distribution, and dispensing of controlled substances); 28 C.F.R. § 0.100 (granting Administrator of DEA authority to do same).

¹⁴³ Rannazzisi Dep. (Day 1) 310:24-25 (“A regulation goes through notice and comment.”).

¹⁴⁴ Prevoznik Rule 30(b)(6) Dep. (Day 1) 89:17-90:13 (“Q. And have either the statute or regulation been amended or altered since 1971 to your knowledge? A. No, they have not.”).

¹⁴⁵ Prevoznik Rule 30(b)(6) Dep. (Day 1) 89:17-90:13.

let us consider the financial industry, regulated by the Bank Secrecy Act, Patriot Act, Money Laundering Control Act of 1986 and associated regulations. Together, these statutes and regulations obligate financial institutions to monitor their accounts for money laundering and other suspicious activity. They, along with their associated administrative guidance, detail the type of monitoring banks must engage in to be compliant. Banks have an obligation to report suspicious activity, but not to stop it. As long as a bank is generally compliant with the regulation, it will not be penalized for failing to report any particular suspicious transaction. There is no set definition of what constitutes suspicious activity; however, the agencies have issued examples and lists of red flag activity that should be considered by banks in monitoring.

The Bank Secrecy Act and related regulations require banks “to report any suspicious transaction relevant to a possible violation of law or regulation.”¹⁴⁶ Banks must have policies “that are reasonably designed to detect and report instances of money laundering through those accounts.”¹⁴⁷ The section includes details about the requirements of such a due diligence policy. These requirements include:

At a minimum: (A) the development of internal policies, procedures, and controls; (B) the designation of a compliance officer; (C) an ongoing employee training program; and (D) an independent audit function to test programs.¹⁴⁸

Suspicious activity reports (SAR) are required to be filed within 30 days of detection of suspicious activity.¹⁴⁹ Unlike for suspicious order monitoring under 21 C.F.R. §1301.74(b), there is a standard form for SAR reporting. Specifically, when transactions aggregate to at least \$5000 and the bank knows, suspects, or has reason to suspect one of the following, the bank must report: 1) the funds are derived from illegal activity or intended to disguise funds from illegal activity, 2) the transaction is designed to evade regulatory requirements, or 3) the transaction has no apparent lawful purpose.¹⁵⁰ This regulation’s outline of specific situations that have to be reported is in stark contrast to 21 C.F.R. §1301.74(b), which only states that suspicious orders include those of unusual size, pattern, or frequency without providing specific examples of what those terms may mean.

Similar specific guidance is offered to national banks, who must file a SAR in situations involving a federal crime. These specific situations include: 1) when the bank knows or suspects a federal criminal violation and the amount involved is \$25000 or greater, 2) where a suspect can

¹⁴⁶ 31 U.S.C. § 5318(g)(1)

¹⁴⁷ 31 U.S.C. § 5318(i)(1)

¹⁴⁸ 31 U.S.C. § 5318(h)(1)

¹⁴⁹ 31 C.F.R. § 1020

¹⁵⁰ 31 C.F.R. § 1020.320

be identified and the amount involved is \$5000 or greater, or 3) where the bank has substantial basis that bank-affiliated parties aided in the crime.¹⁵¹

Where transactions involve a foreign institution, bank are required to have risk-based policies designed to detect money laundering.¹⁵² The regulation details specific factors that should be considered in such policies, including the type of account, nature of the foreign institution's business, nature and duration of the relationship between the regulated bank and the foreign bank, money laundering rules of the foreign jurisdiction, and the foreign banks record with respect to laundering. A periodic review ensures that activity is consistent with the stated purpose of the account.

Special due diligence requirements are placed on accounts with more than \$1 million.¹⁵³ Regulation specifies details about the due diligence program, which must determine the identity of account owners, source of deposited funds, purpose of account, and review activity to ensure it is consistent with the stated purpose of the account.

Guidance for this industry was also a priority during the regulation promulgation process. The regulators stated that “determinations as to whether a report is required must be based on all the facts and circumstances relating to the transaction and bank customer in question.”¹⁵⁴ However, they went on to give specific examples of activity that would need to be reported, and other examples where it would be more of a judgment call based on the specific facts.¹⁵⁵ In contrast under the CSA, DEA has refused to opine on whether activity is suspicious or whether a company’s SOM program would meet DEA’s expectations.

The Bank Secrecy Act is enforced by the Financial Crimes Enforcement Network (FinCEN). Its website provides additional guidance regarding compliance, including a page entitled Guidance with links to documents in which FinCEN has provided guidance on various questions, links to administrative letter rules of general interest, and links to advisories describing specific criminal schemes to look out for including specific red flags.¹⁵⁶ FinCEN also gives further guidance on what should be included on a SAR.¹⁵⁷

¹⁵¹ 12 C.F.R. § 21.11

¹⁵² 31 C.F.R. § 1010.610

¹⁵³ 31 C.F.R. § 1010.620

¹⁵⁴ *Requirements to Report Suspicious Transactions*; Final Rules, 61 Fed. Reg. 4326, 4329 (Feb. 5, 1996).

¹⁵⁵ *Requirements to Report Suspicious Transactions*; Final Rules, 61 Fed. Reg. 4326, 4329 (Feb. 5, 1996).

¹⁵⁶ <https://www.fincen.gov/>

¹⁵⁷ SAR Narrative Guidance; SAR Activity Review, Issue 22; SAR Instructions; Frequently Asked questions regarding the FinCEN suspicious activity report (SAR).

Additionally, the federal financial institutions examination Council (FFIEC)¹⁵⁸ puts out a manual guiding compliance with Bank Secrecy Act and anti-money laundering examinations. The manual provides further guidance on both SAR filing and customer identification requirements. The section on suspicious activity reporting describes methods used to monitor suspicious activity, including employee observation, responses to requests from law enforcement, and systems to monitor transactions. Of note, the manual states: “The decision to file an SAR is an inherently subjective judgment. Examiner’s should focus on whether the bank has an affective SAR decision making process, not individual SAR decisions.” The manual provides guidance on what constitutes an effective SAR decision making process, and notes that “banks are not obligated to investigate or confirm the underlying crime . . . Investigation is the responsibility of law enforcement.”

The Patriot Act requires banks to “ascertain the identity of the nominal and beneficial owners of, and the source of funds deposited into, such account¹⁵⁹ . . .” Regulations set minimum standards for identifying and verifying the identity of customers applying to open an account, including consulting lists of known terrorists.¹⁶⁰

Instead of simply telling banks, “know your customer,” the regulation goes on to offer specific guidance. The bank must have written procedures regarding identifying account owners. The regulations specify that at a minimum, banks must have customers’ name, date of birth, address, and tax ID number.¹⁶¹ The regulations include a form that can be used to ensure compliance with the identity requirement.¹⁶² The rules also specify verification methods, such as using a non-expired government ID or comparing provided information with a public database.¹⁶³

Overall, and unlike suspicious order monitoring under the CSA, the combination of statutes, regulations, regulatory history, administrative guidance and industry guidance serve to equip those in the financial industry with the knowledge necessary to be in compliance. In particular, they provide details about how to determine whether activity is suspicious and what specific knowledge about customers is required.

C. DEA can offer specific guidance

Once DEA purported to introduce new standards without changing regulations in the December 2007 letter, DEA could have provided registrants with specific guidance on how it expected registrants to identify suspicious orders, investigate suspicious orders, investigate their

¹⁵⁸ This institution includes members like the Federal Reserve, FDIC, OCC, National Credit Union administration, and CFPB.

¹⁵⁹ 31 U.S.C. §5318(i)(3).

¹⁶⁰ 31 U.S.C. § 5318(l).

¹⁶¹ 31 C.F.R. 1020.220

¹⁶² 31 C.F.R. 1010.230

¹⁶³ 31 C.F.R. 1010.230

customers, and/or determine which suspicious orders or customers should be rejected. The need for specific guidance was exacerbated by DEA's rejection of all earlier express and implicit guidance to registrants in the December 2007 letter.¹⁶⁴ However, DEA did not provide specific guidance. In fact, DEA did not even provide answers when registrants repeatedly sought guidance from DEA on these issues.¹⁶⁵ Instead, DEA instructed registrants that it was their responsibility to fill in the details, and if they got it wrong, as determined by DEA, they would face enforcement actions.¹⁶⁶ Moreover, the December 2007 letter stated that DEA would "not approve or otherwise endorse any specific system for reporting suspicious orders."

Members of the Office of Diversion Control have offered various reasons for their unwillingness to provide specific guidance, including they were not allowed to answer questions,¹⁶⁷ that they did not provide information regarding suspicious pharmacies because they

¹⁶⁴ CAH_MDL_PRIORPROD_DEA12_00010980. 10980 ("Past communications with DEA, whether implicit or explicit, that could be construed as approval of a particular system for reporting suspicious orders, should no longer be taken to mean that DEA approves a specific system.").

¹⁶⁵ Ashley Dep. 71:23-72:13 ("Q. Okay. Let's go to the second point, the second bullet point. HDA asked that the DEA update the, quote, letters to industry provided in 2006 and 2007. Do you see that? A. Yes. . . . Q. To your knowledge, were there updated letters to industry provided after 2007? A. I don't recall that."); US-DEA-00008563 (email received by DEA in June 2016 describing questions from HDMA regarding suspicious order monitoring that were sent to DEA in 2011 and 2013, but were never answered). June 1, 2011 HDMA Letter to DEA, "Questions for the Drug Enforcement Administration (DEA) Regarding Requirements for Suspicious Orders Monitoring and Reporting Submitted by the Healthcare Distribution Management Association (HDMA) (US-DEA-00008565-76), at 1-2, 6, 9; July 2, 2013 HDMA Letter to DEA, "Questions for the Drug Enforcement Administration (DEA) by the Healthcare Distribution Management Association (HDMA) Submitted July 2, 2013 for Discussion July 31, 2013," (US-DEA-00008577-83), at 1-2, 5.

¹⁶⁶ MCKMDL00478906, 478908 ("Distributors should consider the totality of the circumstances when evaluating an order for controlled substances, just as DEA will do when determining whether the filling of an order is consistent with the public interest within the meaning of 21 U.S.C. 823(e).").

¹⁶⁷ Wright Dep. (Day 1) 254:7-20 ("There -- there were questions about -- during the time frame early on a distributor initiative time frame -- A. Yes, sir. Q. -- 2005, 2006, 2007, DEA, yourself were receiving questions from distributors about how to set up their Suspicious Order Monitoring programs, correct? A. Correct. Q. And you had mentioned, as I understand your testimony, that you weren't in position to provide them that type of information; is that fair? A. Yes.").

were afraid of being sued,¹⁶⁸ and that they did not offer guidance because they were engaged in litigation with some registrants.¹⁶⁹

Nonetheless, as noted above, DEA's refusal to provide guidance to industry resulted in the U.S. Government Accountability Office issuing a report critical of DEA and led the Acting Administrator of DEA to admit, "we've been opaque. I think we've been slow. I think we've been opaque. I think we haven't responded to them. We're trying to issue guidelines more quickly. We're trying to answer their questions."¹⁷⁰ DEA has also represented in testimony before the Senate Judiciary Committee that, "we recognize the importance of working with registrants – not just at workshops and conferences – but in writing that they can count on – to provide them all the information and, especially, the certainty that they need to be in full compliance, as they want to be and as we expect them to be."¹⁷¹

Even after DEA admitted that it needed to be less opaque and provide better guidance, it appears that the Office of Diversion Control remains unwilling to help some registrants who approach the DEA in good faith to ensure compliance with the regulations. This reluctance was highlighted in the testimony of Mr. Prevoznik, the Associate Section Chief of the Pharmaceutical Investigations Section of the Diversion Control Division. Mr. Prevoznik testified that if a registrant came to him and said, "I am trying to decide whether this order is suspicious," and asked DEA whether the order was suspicious, Mr. Prevoznik "would be extremely concerned ... [b]ecause you are basically telling me that you ... do not have the ability to ... maintain effective guards against diversion if you're coming to us with that hypothetical. Which would be grounds for us to revoke your registration."¹⁷² If Mr. Prevoznik's testimony represents current DEA policy, it means that registrants cannot ask questions about identifying suspicious orders without risking losing their registrations.

IX. THE LIMITED EFFECT OF INCREASED SUSPICIOUS ORDER REPORTING

¹⁶⁸ June Howard Rule 30(b)(6) Dep. 49:2-9 ("Q. Was the threat of litigation, was that threat too scary for the DEA so that it decided it would stop sending the termination notices to distributors? ... [A.] I believe it contributed to ceasing sending out the notifications.").

¹⁶⁹ Prevoznik Rule 30(b)(6) Dep. (Day 1) 200:24-201:15 ("Q. ... This morning you told me that for the 2010-2013 time period, because of litigation and other things, there were not necessarily briefings or distributor conferences held in that time period correct? A. There were -- we had stopped with the distributor initiative and we had stopped with the conferences with the wholesalers, yes. Q. In 2010 to 2013? A. Right. Q. And you told me the main reason was because of litigation and investigations, right? A. Correct.").

¹⁷⁰ Tr. of Senate Judiciary Hearing on DEA Oversight, Testimony of Chuck Rosenberg at 30 (June 22, 2016).

¹⁷¹ Oversight of the Ensuring Patient Access and Effective Drug Enforcement Act, Hearing Before the S. Judiciary Comm. (2017) (statement of Demtra Ashely, Acting Assistant Administrator, Diversion Control Division, Drug Enforcement Administration) at 8.

¹⁷² Prevoznik Rule 30(b)(6) Dep. (Day 1) 292:22-293:18.

If registrants had filed more suspicious order reports it would not have had meaningful impact on preventing diversion because DEA already possessed ARCOS data on controlled substance transactions and DEA rarely made use of the suspicious order reports it did receive.

A. **DEA Already Had Information on Potential “Suspicious Orders” in ARCOS**

Distributors reported all transactions involving purchase or sale of prescription opioid medications to the ARCOS reporting system.¹⁷³ Through ARCOS, DEA can see each and every bottle of opioids that transferred from a manufacturer to a distributor¹⁷⁴ and distributor to a pharmacy, hospital or physician.¹⁷⁵ It can also monitor downstream transactions all the way to the retail level.¹⁷⁶

ARCOS reporting tools allowed DEA to identify pharmacies or physicians that were receiving extraordinarily large volumes of narcotics; DEA did not need registrant’s suspicious order reports to do that.¹⁷⁷

¹⁷³ Prevoznik Rule 30(b)(6) Dep. (Day 1) 326:8-329:19 (describing scope of information contained in ARCOS, and agreeing that it included “all of the distribution of prescription opioids by manufacturers to distributors,” “all the distributions of prescription opioids from distributors to pharmacies or other retail outlets,” and “each and every bottle of opioids that’s transferred from a distributor to a pharmacy”); DEA, Automation of Reports and Consolidated Orders System, <https://www.deadiversion.usdoj.gov/arcos/index.html> (last visited May 25, 2019) (“ARCOS is an automated, comprehensive drug reporting system which monitors the flow of DEA controlled substances from their point of manufacture through commercial distribution channels to point of sale or distribution at the dispensing/retail level - hospitals, retail pharmacies, practitioners, mid-level practitioners, and teaching institutions.”).

¹⁷⁴ Rannazzisi Dep. (Day 1) 24:23-25:1 (“Q. So, Mr. Rannazzisi, using ARCOS, DEA can see the number of opioids sold by manufacturers to distributors? A. Yes.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 326:18-23 (“Q. Would ARCOS contain all of the distributions of prescription opioids by manufacturers to distributors? A. So the transactions for . . . manufacturer to a distributor? Yes.”).

¹⁷⁵ Rannazzisi Dep. (Day 1) 25:2-25:5 (“Q. And using ARCOS, DEA can see the number of opioids distributed by distributors to pharmacies, hospitals and doctors? A. Yes.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 326:24-327:4 (Q. Would ARCOS contain all the distributions of prescription opioids from distributors to pharmacies or other retail outlets? A. For those items, yes.”).

¹⁷⁶ Rannazzisi Dep. (Day 1) 24:10-16 (“[A.] DEA can use that system to monitor transactions downstream. Q. And that’s downstream from the manufacturers all the way to the retail level, correct? A. Yes. I believe so.”); Wright Dep. (Day 2) 538:16-19 (“Q. ARCOS tells you how many pills have been distributed by a distributor to a pharmacy, doesn’t it? A. Correct.”).

¹⁷⁷ Wright Dep. (Day 2) 544:1-11 (“Q. -- you were using these ARCOS reporting tools to identify pharmacies having extraordinarily large prescriptions in narcotics, and you present that data to the distributors, correct? A. Yes, sir. Q. You didn’t -- you didn’t need distributors’ suspicious order reports to do that analysis, did you? ... [A.] No, sir.”); Wright Dep. (Day 2) 541:3-543:6 and Ex. 49; DEA Announces Enhanced Tool for Registered Drug Manufacturers

Moreover, up until February 2018, registrants did not have any access to other registrants' ARCOS data.¹⁷⁸ Although this had been requested by registrants, DEA declined to share it.¹⁷⁹ Further, except for individual meetings with registrants, such as during the Distributor Initiative briefings, when DEA identified potential internet pharmacies using ARCOS data, DEA did not share with distributors when it learned of suspicious pharmacies through ARCOS.¹⁸⁰ For a brief period after the distributor briefing, DEA informed distributors when another distributor terminated or restricted sales of controlled substances to a particular registrant.¹⁸¹ However, DEA ceased this practice in 2007.¹⁸² DEA decided to stop sharing this information because it did not want to risk being sued by the identified registrants and because field office personnel were concerned that legitimate pharmacies were being identified as

and Distributors to Combat Opioid Crisis (2019), <https://www.dea.gov/press-releases/2019/02/26/dea-announces-enhanced-tool-registered-drug-manufacturers-and> (last visited May 25, 2019) (describing DEA's implementation of an amendment to the CSA requiring DEA "to provide drug manufacturers and distributors with access to anonymized information through the Automated Reports and Consolidated Orders System (ARCOS) to help drug manufacturers and distributors to identify, report and stop suspicious orders of opioids and reduce diversion on sales to ultimate users").

¹⁷⁸ Wright Dep. (Day 2) 554:11-25 ("Q. But DEA, up until 2018, did not permit other distributors to see the ARCOS data so that they could determine how much of a ... controlled substance was being shipped into a pharmacy by another distributor; isn't that correct? ... [A.] Yes, sir."); DEA Announces Enhanced Tool for Registered Drug Manufacturers and Distributors to Combat Opioid Crisis (2019), <https://www.dea.gov/press-releases/2019/02/26/dea-announces-enhanced-tool-registered-drug-manufacturers-and> (last visited May 25, 2019) (describing DEA's implementation of an amendment to the CSA requiring DEA "to provide drug manufacturers and distributors with access to anonymized information through the Automated Reports and Consolidated Orders System (ARCOS) to help drug manufacturers and distributors to identify, report and stop suspicious orders of opioids and reduce diversion on sales to ultimate users").

¹⁷⁹ Rannazzisi Dep. (Day 1) 26:3-13 ("Q. Registrants requested ARCOS data from DEA at various times, but DEA declined to share it, correct? ... [A.] Just answering the question in order ... registrants have requested access to ARCOS ... for that data. And they have been declined, yes.").

¹⁸⁰ Wright Dep. (Day 1) 96:23-97:4 ("Q. And you looked for these outliers and the anomalies in the registrants' ARCOS data? A. Yes. Q. Did you use any other resource to find these outliers and anomalies? A. Not to my recollection."); Wright Dep. (Day 2) 550:12-25 ("Q. After identifying a suspicious pharmacy is in the ARCOS data, did you ever inform distributors of the identification of that pharmacy? ... [A.] No.").

¹⁸¹ Howard Depo. 28:17-1 ("Q. Following the first of the distributor briefings in 2005, DEA established an e-mail group to announce actions taken by distributors to either discontinue or limit supply to customers. A. Yes. Q. And these termination notices identified customers distributors had discontinued or restricted business with, correct? A. Correct.").

¹⁸² Howard Depo. 45:9-13 ("Q. And do you know when the DEA stopped sending termination notices to distributors? A. Based on the DEA records that I reviewed, it appears that it ceased in December 2007.").

suspicious.¹⁸³ Thus, DEA was in the unique position to combine information from multiple sources to see potential diversion at pharmacies in a way that no distributor could.

For example, if one distributor cut off a particular pharmacy, the pharmacy could start ordering from another. DEA could see this from the ARCOS data, but distributors could not. Accordingly, one way to stop a rogue pharmacy or pill mill from continuing to divert opioids would be for DEA to suspend its registration so distributors would know to stop business with that pharmacy or pill mill.

B. Suspicious Orders Reports Rarely—if Ever—Led to DEA Actions Against Registrants

Only a small fraction of suspicious order reports ever result in DEA actions against registrants. DEA received 1.2 million suspicious order reports from 2007-2018.¹⁸⁴ Between 2007 and 2017, DEA had 9,851 actions leading to registration revocation, including 254 immediate suspension orders and 638 orders to show cause.¹⁸⁵ Not all of these revocations were related to suspicious order reports, but even assuming that they were, it would still be the case that less than 1% of SORs result in revocation.¹⁸⁶ There are many possible reasons why

¹⁸³ Howard Depo. 47:2-13 (“Q. Why did DEA stop sending the termination notices to distributors? A. Based on my review of the DEA records, it appears the notification process ceased because diversion investigators in the field expressed concern about the notification, and individuals on the listing were legitimate pharmacies or doctors and needed their product for legitimate medical purposes. Also, the threat of potential litigation. And -- that's it for now, if I can -- yeah.”), 47:14-18 (“Q. And what were the concerns of the diversion investigators? A. That registrants that were identified had legitimate purposes for ordering product and they should not be blacklisted.”), 47:19-48:3, 49:2-9 (“Q. Was the threat of litigation, was that threat too scary for the DEA so that it decided it would stop sending the termination notices to distributors? ... [A.] I believe it contributed to ceasing sending out the notifications.”).

¹⁸⁴ The Drug Enforcement Administration’s Role in Combating the Opioid Epidemic, Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 115th Cong., 115-110 (2018) (Questions for the Record for Drug Enforcement Administration) at 93 (“DEA headquarters received 1,204,400 electronic SORs from 135 distinct registrants from 2007 to 2018.”); Prevoznik Rule 30(b)(6) Dep. (Day 2) 556:7-11 (“Between 2007 and 2018 DEA received over 1.2 million electronic suspicious order reports from registrants, true? A. Yes.”).

¹⁸⁵ Combatting the Opioid Crisis: Exploiting Vulnerabilities in International Mail, Hearing Before the Subcomm. on Investigations of the S. Comm. on Homeland Security and Governmental Affairs, 115th Cong., 115-317 (2018) (Questions for the Record for Drug Enforcement Administration) at 275 (containing chart of “Actions Leading to Registration Revocation”).

¹⁸⁶ Compare The Drug Enforcement Administration’s Role in Combating the Opioid Epidemic, Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 115th Cong., 115-110 (2018) (Questions for the Record for Drug Enforcement Administration) at 93 (“DEA headquarters received 1,204,400 electronic SORs from 135 distinct registrants from 2007 to 2018.”) with Combatting the Opioid Crisis: Exploiting Vulnerabilities in

suspicious order reports may not yield action: (1) DEA is not obligated to investigate suspicious order reports,¹⁸⁷ (2) the suspicious order reports contain many false positives because DEA has only provided vague guidance on how to identify suspicious orders; (3) normal ordering patterns by a pharmacy that is not responsible for diversion of controlled substances may result in “orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency”;¹⁸⁸ (4) exigent circumstances such as natural disasters may lead to “orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency”;¹⁸⁹ (5) human error, including typos in orders or “fat fingers,” may result in “orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency,”¹⁹⁰ and (6) determining whether an order reflects actual diversion is particularly challenging during a time period when DEA quotas were being increased and legitimate prescriptions were increasing. In addition, I understand from my experience and the testimony in this case that some enforcement agents as well as diversion investigators did not use suspicious order reports.¹⁹¹ Instead, diversion investigators used ARCOS data that contained all transactions from a distributor or manufacturer.

International Mail, Hearing Before the Subcomm. on Investigations of the S. Comm. on Homeland Security and Governmental Affairs, 115th Cong., 115-317 (2018) (Questions for the Record for Drug Enforcement Administration) at 275 (containing chart of “Actions Leading to Registration Revocation” for years 2007 to 2017 that add up to 9,851); Press Release, DEA, DEA Surge in Drug Diversion Investigations Leads to 28 Arrests and 147 Revoked Registrations (Apr. 2, 2018), <https://www.dea.gov/press-releases/2018/04/02/dea-surge-drug-diversion-investigations-leads-28-arrests-and-147-revoked> (“During that period, the DEA surged the efforts of special agents, diversion investigators, and intelligence research specialists to analyze 80 million transaction reports from DEA-registered manufacturers and distributors, as well as reports submitted on suspicious orders and drug thefts and information shared by federal partners, such as the Department of Health and Human Services. This resulted in the development of 366 leads to DEA field offices, 188 of (51 percent) resulted in active investigations by DEA’s 22 field divisions.”); Martin Dep. 228:21-229:11 (confirming that the press release noted that DEA analysis of 80 million transaction reports led to only 188 investigations).

¹⁸⁷ Wright Dep. (Day 1) 164:11-15 (“Does DEA have an obligation to investigate a suspicious order after it is reported by a distributor? ... THE WITNESS: No.”).

¹⁸⁸ 21 C.F.R. § 1301.74(b).

¹⁸⁹ 21 C.F.R. § 1301.74(b).

¹⁹⁰ 21 C.F.R. § 1301.74(b).

¹⁹¹ Martin Dep. 131:17-25 (“Q. As ASAC of DEA Cleveland and through other work that you’ve done at DEA, you’re familiar with what a suspicious order report is? A. Actually, no, because that is on the diversion side. . . . I’ve never seen a suspicious order report”); And the DEA’s diversion investigators did not use such reports; Baker-Stella Dep. (Day 2) at 466:17-20 (“Q. In your work at TDS on any investigation have you ever used a suspicious order report? A. Not that I can recall.”); Leonard Dep. (Day 3) at 399:18-20 (testifying that Leonard doesn’t use suspicious order data).

Given DEA's limited historical use of suspicious order reports to initiate actions against registrants, there is no basis to conclude that registrants filing additional suspicious order reports would have resulted in a meaningful decrease in diversion. Indeed, Mr. Rafalski, a former diversion investigator, has testified that failing to report a suspicious order does not cause diversion.¹⁹²

However, it is difficult to conclusively answer why suspicious order reports did not and still do not lead DEA to take actions against registrants; indeed, DEA does not even keep statistics about what percentage of suspicious order reports DEA converts into criminal indictments or convictions.¹⁹³ In contrast, it does maintain such statistics on its OCDETF cases.¹⁹⁴

X. CONTRIBUTORS TO THE DRUG CRISIS OUTSIDE THE CONTROL OF REGISTRANTS

Drug abuse existed in the United States prior to the diversion of prescription opioids and will continue in the future regardless of the availability of prescription opioids. The current opioid epidemic is best understood in the context of a decades-long drug overdose epidemic that began at least as early as the 1970s. The drug overdose epidemic is fueled by drug trafficking organizations that have long distributed illicit drugs, including illicit opioids, outside the "closed system of distribution"; the introduction of highly potent and dangerous illicit fentanyl from international sources; and the decisions of individual bad actors that trafficked illicit opioids or diverted prescription opioids outside the controls of the defendant registrants.

A. Drug Abuse Existed Prior to Prescription Opioids.

Before OxyContin was released in 1996, illicit drugs were causing considerable nationwide problems. When I worked for the St. Louis Police Department in the 1970s and 1980s, illicit drug abuse caused major public problems that forced the City of St. Louis to devote substantial public resources to combatting and treating drug abuse. When I worked for the DEA in the 1980s, the 1990s, and the 2000s, the same illicit drug problems applied on a broader national scale.

As a result of the widespread problems posed by illicit drugs, during my time at DEA, illicit drugs were always the DEA's primary focus and prescription drugs were never a top

¹⁹² Rafalski Dep. (Day 1) 371:20-23 ("You'd agree that not reporting the suspicious order to DEA is not what causes diversion? A. That's correct.").

¹⁹³ Prevoznik Rule 30(b)(6) Dep. (Day 2) 583:16-584:9 ("Q. Okay. Do you know what percentage of suspicious order reports DEA converted into criminal indictments between 2007 and 2017? ... [A.] I do not. Q. ... So between 2007 and 2017, would you know what percentage of suspicious order reports DEA converted into criminal convictions? ... [A.] I do not. ... Q. Does DEA keep those kind of statistics? A. No, we don't.").

¹⁹⁴ Prevoznik Rule 30(b)(6) Dep. (Day 2) 584:10-16 ("Q. ... You're aware that DEA keeps those kind of statistics, investigations initiated, indictments returned, convictions obtained on all of their OCDETF cases and reports them. Are you aware of that? A. Correct, yes.").

priority. This remained the case even after OxyContin was released in the 1990s because the addiction, the crime, and the violence associated with drugs has always centered on the drug dealers and the cartels who traffic illicit substances.

B. The Illicit Drugs and Drug Trafficking Organizations That Are Causing Problems Today Have Existed For Decades.

Since I first joined the St. Louis Police Department in the 1970s, heroin has posed problems throughout the United States and drug cartels have trafficked heroin across the Southwest Border.¹⁹⁵ Since I joined the St. Louis Police Department in the 1970s, drug dealers, drug traffickers, and international drug cartels have existed and distributed illicit drugs.

Throughout my entire career at the DEA, the focus of the DEA's enforcement efforts has been on international drug cartels, such as the Sinaloa Cartel in Mexico and the Cali Cartel in Colombia. The DEA's focus has always been on these international drug trafficking organizations because they are responsible for the majority of the illicit drug trade in the United States.

The cartels that distribute drugs to the United States typically sell many different types of illicit drugs. For example, the same Mexican drug trafficking organizations that traffic heroin, traffic methamphetamine, cocaine, and marijuana.¹⁹⁶ In addition, for as long as I can recall, cartels have manufactured counterfeit prescription drugs and diverted prescription drugs.

In many instances, foreign drug regulation is much looser than American drug regulation, which is why foreign drug regulations can have a substantial impact on the trafficking of prescription drugs into the United States. During my time at DEA, loose prescription drug regulation was a problem with pseudoephedrine, a common cold medicine which is often diverted to be used to manufacture drugs like meth. In Mexico and Canada, you could buy pseudoephedrine in bulk, unlike in the United States, which has restrictive regulations governing how much you can purchase.

Summit and Cuyahoga County have problems with heroin and Mexican drug trafficking organizations today and they have had those problems for decades.¹⁹⁷ This is unsurprising

¹⁹⁵ Leonard Dep. (Day 3) 444:8-10 (testifying that there "was heroin prior to my birth"). And as several of Plaintiffs witnesses testified, it would exist whether or not another opioid was ever prescribed in the United States; Leonard Dep. (Day 3) 446:18-447:7 ("Q. And whether or not another prescription opioid is-- were ever prescribed, dispensed, again, in the United States, there would still be an issue with fentanyl and heroin? A. Yes. Heroin has been her for a century. I mean, heroin has been a problem for a long time.").

¹⁹⁶ OH-HIDTA_000989, 1001 (indicating that "Mexican DTOs remain the greatest threat to the Ohio HIDTA region" because they traffic "heroin, cocaine, marijuana, and . . . methamphetamine.")

¹⁹⁷ SUMMIT_000023567, 23607-23609 (describing heroin as a "high" threat to Summit County in 2005 and indicating that "Mexican Drug Trafficking Organizations are the primary transporters and distributors of Mexican Black Tar, and Brown powdered heroin into Ohio");

because it is consistent with my experience and my understanding of the longstanding drug trafficking problems along the Southwest Border.¹⁹⁸

C. The Characteristics of the Illicit Drug Market

In my 23 years at DEA, I kept myself informed of drug trafficking trends and drug abuse trends so that I could identify priorities and threats and allocate resources effectively. During that time, I observed the following:

The rates of drug trafficking and drug abuse have been increasing for decades.¹⁹⁹ There are many reasons for this, including (1) the introduction of drugs that provide a relatively inexpensive and intense high, such as crack cocaine and heroin, (2) economic depression in specific parts of the country, (3) advances in technology including features such as encrypted internet servers and development of the “dark net” making trafficking easier and more difficult to detect, and (4) the increasing sophistication and organization of drug trafficking networks.²⁰⁰

Drug abuse is cyclical. It is common for a particular drug to surge, then disappear, and then spike again. For example, heroin was the dominant drug of abuse in the 1970s, crack and

OH-HIDTA_003501, 003503 (defining heroin as “a significant drug threat to the Ohio HIDTA region“ in 2002 and explaining that “Mexican black tar, Mexican brown powdered, and South American heroin are the most prevalent in Northern Ohio.”); Martin Dep. 213:21-214:7 (“Q. And is it also common knowledge that it is the drug cartels that are moving those -- the heroin across that southwest border into the United States? . . . A. Yes. Q. And it’s those same cartels or drug trafficking organizations that further move the heroin into the state of Ohio? A. Yes.”), 320:20-321:3 (“Q. What’s the second question? A. ‘How are illegal opioids coming into the Cleveland area?’ Q. And what was your response? A. ‘The most known or common way is the Mexican cartels are bringing it up. They are using the same routes that they’ve been using for the last hundred years, same routes, different methods of concealment.’”)

¹⁹⁸ Sheehan Hannan, *Our Epidemic, Fighting the Opioid Problem*, Cleveland Magazine (Sept, 8, 2018, <https://clevelandmagazine.com/in-the-cle/our-epidemic/articles/our-epidemic-fighting-the-opioid-problem>) (reporting that “Mexican cartels” are bring drugs up to Cleveland “using the same routes that they’ve been using for the last hundred years.”).

¹⁹⁹ Hawre Jalal et al., *Changing dynamics of the drug overdose epidemic in the United States from 1979 through 2016*, SCIENCE MAGAZINE, Vol. 361 Issue 6408 (September 21, 2018) (concluding that the “U.S. drug overdose epidemic has been inexorably tracking along an exponential growth curve since at least 1979.”).

²⁰⁰ OH-HIDTA_003369, 3371-3372 (attributing Northeast Ohio’s drug issues to “economic depression” and the “introduction of ‘crack’ cocaine in the mid-1980s, which allowed for a relatively inexpensive and intense high”); Sheehan Hannan, *Our Epidemic, Fighting the Opioid Problem*, Cleveland Magazine (Sept, 8, 2018, <https://clevelandmagazine.com/in-the-cle/our-epidemic/articles/our-epidemic-fighting-the-opioid-problem>) (reporting that cartels are employing different methods of concealment as well as increasingly utilizing the dark web).

cocaine were the dominant drugs of abuse in Northeast Ohio the 1980s and 1990s,²⁰¹ methamphetamine and cocaine were dominant drug of abuse in Northeast Ohio in the early 2000s,²⁰² heroin became the dominant drug in Northeast Ohio in the 2010s,²⁰³ and there have been recent shifts towards cocaine and methamphetamine.²⁰⁴ A prime example of the cyclical nature of drug abuse is fentanyl, which has come and gone in cycles in the early 1990s and the mid-2000s.²⁰⁵

Drug cartels drive drug availability and are sophisticated business enterprises that frequently adapt to increase their profitability. For example, traffickers have taken aggressive measures to push heroin, like offering free methamphetamine to dealers, in order to expand the market for heroin, which is a more profitable and potent drug.²⁰⁶ Likewise, cartels are known to push particular drugs to address oversupplies.²⁰⁷ To increase their profits, traffickers also market

²⁰¹ OH-HIDTA_003369, 3371-3372 (highlighting the introduction of crack cocaine in the mid-1980s and 1990s as a reason to designate Ohio as a high intensity drug trafficking area)

²⁰² OH-HIDTA_003501, 3503 (identifying cocaine as “the greatest drug threat in the major metropolitan areas that comprise the five designated Ohio High Intensity Drug Trafficking Area (HIDTA) Counties.”); Law Enforcement and the Fight against Methamphetamine: Improving Federal, State, and Local Efforts, Hearing Before the H. Comm. on Government Reform, 109th Cong., 109-103 (2005) (statement of John Sommer, Director, Ohio High Intensity Drug Trafficking Area (HIDTA)) at 23-24 (describing the situation in Ohio with methamphetamines as an “epidemic”).

²⁰³ OH-HIDTA_000701, 708 (identifying heroin as the greatest drug threat in Northeast Ohio in 2011).

²⁰⁴ AKRON_000236206 (identifying an increased supply of cocaine and an increased use of methamphetamine in 2017 as possible causes for a dramatic reduction in opioid overdoses); OH-HIDTA_000989, 999 (reporting that the “Ohio HIDTA is experiencing an increase in the use, seizure and prescribing of stimulants.”); Shane Hoover, *Has the opioid drug crisis peaked? Overdose deaths drop in Stark, Summit Counties*, AKRON BEACON JOURNAL, November 16, 2018 (reporting an increase in stimulants and quoting the Executive Director of the Ohio High Intensity Drug Trafficking Area as predicting that stimulants will be the next crisis).

²⁰⁵ AKRON_001143207 (DEA bulletin discussing a 2005-2006 “fentanyl overdose epidemic”); SUMMIT_000023567, 23630 (discussing a fentanyl scare that occurred on the eastern coast in the 1990s); Martin Dep. 186:10-19 (expressing the opinion that cocaine, heroin, illicit fentanyl and carfentanyl, and methamphetamines are the greatest drug threats to Summit and Cuyahoga counties).

²⁰⁶ OH-HIDTA_003369, 3373 (reporting a “growing tendency of . . . gang related groups, to supplement their cocaine shipments with heroin, in an obvious attempt to create a greater market for this poison.”); CUYAH_012915194, 12915203 (reporting that heroin use is increasing because of “pressure from dealers to switch from crack and prescription drugs to more-profitable heroin”); OH-HIDTA_00989, 1001 (reporting that “Mexican DTOs in parts of Ohio are providing methamphetamine to dealers for free in order to sell them heroin.”).

²⁰⁷ AKRON_000236206 (reporting that “Mexican cartels have an oversupply of cocaine and are flooding the market with it.”).

products that are cheaper to produce, easier to smuggle, and more profitable. Pressures like these are common when traffickers are looking to offload inventories of particular drugs, target new drug abusers, or market more potent and profitable products.²⁰⁸

It is common for drug traffickers to target the same clients with multiple different substances. Since traffickers' business model revolves around getting their clients high, cartels can change pricing and supply to affect what their clients purchase, which can have a substantial impact on the broader drug market and influence which drug is the dominant drug of abuse at a given time. This is especially so because it is common for drug abusers to abuse multiple drugs and switch between different substances.²⁰⁹

To increase profits, dealers often mix drugs with cheaper fillers to increase the weight of their drug for resale.²¹⁰ But fillers may alter the taste, texture, or effects of the drug.²¹¹ To counteract that effect, dealers may mix the diluted drug with a more potent substance.²¹² As a result, there is an extraordinarily wide variance in potency amongst the same illicit drugs sold by different dealers.

D. Cyclical Illicit Drug Choices

The fact that heroin is abused in Summit County and Cuyahoga County today is unsurprising. Although its prevalence has ebbed and flowed over time, heroin existed in Cleveland in the early 1990s²¹³ and has been abused for as long as I have worked in law enforcement. There was a heroin epidemic in the 1970s and I confronted heroin as a narcotics

²⁰⁸ CLEVE_2288891 (indicating that lacing marijuana with fentanyl "may be the next step cartels are taking to target new users to become fentanyl users."); CUYAH_012915194, 12915203 (reporting that heroin use is increasing because of "pressure from dealers to switch from crack and prescription drugs to more-profitable heroin")

²⁰⁹ AKRON_001102789 (reporting that 88% of drug abusers use more than one substance); AKRON_000236206 (indicating that users are switching from opioids to non-opioids based on the availability of cocaine and meth); Shane Hoover, *Has the opioid drug crisis peaked? Overdose deaths drop in Stark, Summit Counties*, Akron Beacon Journal, November 16, 2018 (reporting that "[m]any individuals who die from overdoses . . . test positive for a mixture of prescription and street drugs, including cocaine, benzodiazepines, methamphetamine and opioids, such as fentanyl and carfentanil.").

²¹⁰ AKRON_001143207, 001143215 (reporting that "[d]rug traffickers typically mix a diluent with narcotics to increase the weight for resale").

²¹¹ AKRON_001143207, 001143215 ("A side effect of a diluent is reducing the potency of the original substance, which may alter the 'taste,' texture, or effects of the drug.").

²¹² AKRON_001143207, 001143215 (explaining that when fentanyl is being added to heroin, "fentanyl is so powerful that the heroin is being enhanced"). Martin 188:8-10 (noting that fentanyl can be made to look like Oxy 30's, Percocet).

²¹³ Douglas Montero, *The Comeback Drug; Police, Social Workers Fear Heroin 'Epidemic'*, PLAIN DEALER, November 15, 1992 (reporting that use of "heroin . . . in Greater Cleveland and in the United States is on the rise, and there is fear it may become the drug of the '90s.").

detective in St. Louis the 1970s. Heroin use receded while crack and cocaine use grew in the 1980s and 1990s,²¹⁴ but cycled back and supplanted crack and cocaine use in the late 2000s.²¹⁵ The trend is now moving towards cocaine and meth becoming the dominant drugs of abuse today, underscoring that the problem communities are facing today is an illicit drug problem and not just an opioid problem.²¹⁶

Heroin distribution and purity increased throughout the 1980s, 1990s, and 2000s.²¹⁷ During that time, traffickers also reduced prices and pressured dealers both directly and through incentives to switch from other drugs like crack and meth to more profitable heroin.²¹⁸ Increased heroin trafficking, increased heroin potency, pressure from dealers, and decreased heroin prices have all contributed to a rise in heroin abuse and heroin-related crime.²¹⁹ Potency contributes to a drug's addictiveness, and lower pricing makes the drug more accessible and more appealing to drug users. In particular, the DEA observed in the 1990s that heroin's "increase in purity led to

²¹⁴ OH-HIDTA_003369, 3371-72 (highlighting the introduction of crack cocaine in the mid-1980s and 1990s as a reason to designate Ohio as a high intensity drug trafficking area).

²¹⁵ OH-HIDTA_000701, 708 (identifying heroin as the greatest drug threat in Northeast Ohio in 2011).

²¹⁶ AKRON_000236206 (identifying an increased supply of cocaine and an increased use of methamphetamine in 2017 as possible causes for a dramatic reduction in opioid overdoses); OH-HIDTA_000989, 999 (reporting that the "Ohio HIDTA is experiencing an increase in the use, seizure and prescribing of stimulants."); Shane Hoover, *Has the opioid drug crisis peaked? Overdose deaths drop in Stark, Summit Counties*, Akron Beacon Journal, November 16, 2018 (reporting an increase in stimulants and quoting the Executive Director of the Ohio High Intensity Drug Trafficking Area as predicting that stimulants will be the next crisis).

²¹⁷ OH-HIDTA_003501, 3503 (reporting that the "distribution of heroin of all types . . . is increasing along with quantitates trafficked, purity levels, and reduced prices."); CLEVE_001484132, 1484133-1484135 (reporting that heroin is available in larger quantities and that heroin abuse has grown since 2007).

²¹⁸ OH-HIDTA_003501, 3503 (reporting reduced heroin pricing); Douglas Montero, *The Comeback Drug; Police, Social Workers Fear Heroin 'Epidemic'*, Plain Dealer, November 15, 1992 (reporting that the "reasons for the growing popularity of heroin are that its cheaper and more potent, and that its availability in the streets has increased"); CUYAH_012915194, 12915203 (reporting that heroin use is increasing because of "pressure from dealers to switch from crack and prescription drugs to more-profitable heroin"); OH-HIDTA_00989, 1001 (reporting that "Mexican DTOs in parts of Ohio are providing methamphetamine to dealers for free in order to sell them heroin.").

²¹⁹ OH-HIDTA_000701, 708 (reporting that "[i]ncreased heroin trafficking has resulted in a rise in heroin abuse and heroin related crime"); OH-HIDTA_003501, 3503 (reporting that the heroin user population is growing and that heroin availability is growing at reduced prices); CLEVE_001484132, 1484133-1484135 (reporting that heroin is available in larger quantities, that heroin abuse has grown since 2007, and that there are "high purity batches of heroin solid in certain markets"); CUYAH_012915194, 12915203 (reporting that heroin use is increasing because of "pressure from dealers to switch from crack and prescription drugs to more-profitable heroin").

an increase in the number of heroin users” because when “heroin is in higher purity, it can be snorted or smoked which broadens its appeal” because it reduces “the stigma associated with injecting.”²²⁰

I am of the opinion to a reasonable degree of professional certainty that drug traffickers and dealers all played a very important role in causing heroin use to grow. Whereas the increased availability and purity of heroin directly caused increased heroin abuse, there is evidence that few non-medical prescription opioid users go on to use heroin and that few non-medical prescription opioid users started with a medically necessary opioid prescription.²²¹ And the vast majority of individuals who reported transitioning from prescription opioids or heroin, reported the misuse of another drug before prescription opioids.²²² It is consistent with my experience that is common for drug addicts to abuse and switch amongst various drugs.²²³ It is also consistent with my experience that many heroin abusers initiate their use with heroin.

²²⁰ CLEVE_001484132, 1484139 (explaining that heroin’s appeal broadened when heroin became pure enough that it could be snorted because many people “who would never consider injecting a drug were introduced to heroin by inhalation”).

²²¹ CUYAH_002048206 (several treatment providers reporting that it is “rare for one of our clients to have started with a medically necessary opioid”); CLEVE_001484132, 1484139 (reporting that “only a small number (approximately 4 percent) of CPD abusers initiate heroin use”); CUYAH_001670519 (reporting “[i]ncreased use of heroin as an initiating opioid of abuse”).

²²² *Reduce Prescription Drug Abuse*, INSTITUTE FOR BEHAVIOR AND HEALTH, <https://www.ibhinc.org/reduce-prescription-drug-abuse> (“Among 4,493 individuals treated for opioid addiction whose first exposure to opioids was through a prescription from their physician, notably 94.6% reported prior or coincident use of other psychoactive drugs. Alcohol was used by 92.9%, nicotine by 89.5% and marijuana by 87.4%, and excluding these top substances, fully 70.1% reported other prior or coincident drug use.”); Pradip Muhuri, Joseph Gfroerer, and M. Christine Davies, *Associations of Nonmedical Pain Reliever Use and Initiation of Heroin Use in the United States*, CBHSQ Data Review (SAMSA) (Aug. 2013, <https://www.samhsa.gov/data/sites/default/files/DR006/DR006/nonmedical-pain-reliever-use-2013.htm>) (reporting that 86.1 percent of prior nonmedical pain reliever users have a history of prior illicit drug abuse); Deni Carise et al, *Prescription OxyContin Abuse Among Patients Entering Addiction Treatment*, AMERICAN JOURNAL OF PSYCHIATRY (Nov. 1, 2007), https://ajp.psychiatryonline.org/doi/full/10.1176/appi.ajp.2007.07050252?url_ver=Z39.88-2003&rfr_id=ori%3Arid%3Acrossref.org&rfr_dat=cr_pub%3Dpubmed&) (reporting that 77% of OxyContin abusers had also taken cocaine).

²²³ AKRON_001102789 (reporting that 88% of drug abusers use more than one substance); AKRON_000236206 (indicating that users are switching from opioids to non-opioids based on the availability of cocaine and meth); Shane Hoover, *Has the opioid drug crisis peaked? Overdose deaths drop in Stark, Summit Counties*, Akron Beacon Journal, November 16, 2018 (reporting that “[m]any individuals who die from overdoses . . . test positive for a mixture of prescription and street drugs, including cocaine, benzodiazepines, methamphetamine and opioids, such as fentanyl and carfentanil.”).

Since drug dealers and drug traffickers, not pharmaceutical manufacturers and distributors, manufacture and distribute heroin in the United States, drug dealers and drug traffickers are a major contributor to heroin abuse in Northeast Ohio today. In particular, the Mexican drug trafficking organizations that ship heroin across the Southwest border are the primary source of the heroin in Summit County and Cuyahoga County.²²⁴

E. Drug Cartels and Dealers, Not Demand, Drive the Illicit Fentanyl Market.

Illicit fentanyl and carfentanil are the main cause of opioid problems in Northeast Ohio today.²²⁵ Indeed, several reports describe fentanyl as the primary drug trafficking threat to Northeast Ohio,²²⁶ while coroner reports show that fentanyl and carfentanil have been driving drug overdose deaths since 2014.²²⁷ DEA has also publicly stated that “[w]hile a number of factors appear to be contributing to this public health crisis, chief among the causes is the sharp increase in recent years in the availability of illicitly produced, potent substances structurally related to fentanyl.”²²⁸ In fact, DEA has gone so far as to state in its drug information sheet on fentanyl that “[i]llicitly manufactured fentanyl is chiefly responsible for the current domestic crisis.”²²⁹ During my time at DEA, I had heard of fentanyl, but I had never heard of carfentanil, which was not on anyone’s radar as a possible drug of abuse until its sudden appearance in 2016.²³⁰

²²⁴ SUMMIT_000023567, 23609 (reporting “Mexican Drug Trafficking Organizations” as the “primary transporters and distributors of Mexican Black Tar, and brown powdered heroin into Ohio” in 2005); OH-HIDTA_000937, 944 (reporting that the “primary source of the heroin being transported and sold in Ohio is Mexican DTOs in 2016); Sheehan Hannan, *Our Epidemic, Fighting the Opioid Problem*, Cleveland Magazine (Sept. 8, 2018, <https://clevelandmagazine.com/in-the-cle/our-epidemic/articles/our-epidemic-fighting-the-opioid-problem>) (explaining that the “most common way” drugs are coming into Cleveland is from :Mexican cartels”).

²²⁵ Martin Dep. 186:10-19 (agreeing that cocaine, heroin, illicit fentanyl, meth and carfentanil are the greatest drug threats to Ohio today); Kenneth Ball Dep. 247:23-248:2 (testifying that fentanyl and carfentanil tipped the Akron’s drug problems over the edge).

²²⁶ OH-HIDTA_000989, 997 (identifying “[f]entanyl and its analogues” as “the primary drug threat in the Ohio HIDTA Region” in 2017).

²²⁷ AKRON_000206798 (overdose death investigation spreadsheet from 2014-2018 identifying fentanyl or carfentanil as the cause of death in the vast majority of drug overdose cases).

²²⁸ Drug Enforcement Administration; Schedules of Controlled Substances Temporary Placement of Fentanyl-Related Substances in Schedule I, 83 Fed. Reg. 5188, 5188 (Feb. 6, 2018).

²²⁹ Drug Enforcement Administration, Fentanyl Drug Information Sheet (2018), https://www.deadiversion.usdoj.gov/drug_chem_info/fentanyl.pdf (last visited May 27, 2019).

²³⁰ Martin Dep. 282:4-11 (testifying that he first “became aware of carfentanil in approximately July of 2016”); SUMMIT_00132316 (reporting that the DEA in Cleveland’s first carfentanil arrest occurred in November 2016); Greta Johnson (“Johnson”) Rule 30(b)(6) Dep. 91:16-18 (“I don’t know that any of us had heard of carfentanil until about 2016”); Derek Siegle (“Siegle”)

Nonmedical fentanyl use in Summit County and Cuyahoga County is driven by illicit fentanyl use, not pharmaceutical fentanyl use,²³¹ and the source of illicit fentanyl is drug dealers, not pharmaceutical manufacturers and distributors.²³² A huge reason for the rise in fentanyl abuse is that it is being seen mixed in other drugs, including methamphetamine, cocaine, heroin, and counterfeit prescription drugs laced with fentanyl.²³³

Mexican drug cartels—the same cartels the DEA has historically investigated—are a primary source of illicit fentanyl.²³⁴ The other principal source of fentanyl is China, where many fentanyl analogues were legal, and web-based trafficking is growing.²³⁵

Mexican fentanyl is generally shipped across the Southwest Border, and Chinese fentanyl is most often shipped by postal carrier, which can make fentanyl difficult, if not impossible, to interdict.²³⁶ Fentanyl traffickers actually prefer to use the United States Postal Service (“USPS”)

Dep. 121:5-23 (testifying that carefentanil caught the region by surprise and wasn’t seen in the area until very recently.)

²³¹ CLEVE_000273623, 0273630 (November 2014 email in which the Commander of the Cleveland Narcotics Unit states that Mexican cartels are shipping fentanyl over the border and he does not believe the fentanyl problems are “coming from any kind of pharmaceutical diversion.”); AKRON_001143207; 114208 (“DEA Reporting indicates that pharmaceutical diversion of fentanyl normally does not result in bulk fentanyl distribution.”).

²³² Siegle Dep. 120:19-121:4 (reporting that the majority of fentanyl related problems are related to the illicit fentanyl shipped by drug trafficking organizations).

²³³ Martin Dep. 188:2-11.

²³⁴ OH-HIDTA_000989, 997 (identifying “Mexican DTOs” as the “primary source of the fentanyl being transported and sold in Ohio”); AKRON_001143207, 1143215 (identifying “at least one Mexican DTO” as the source of the fentanyl coming into the United States since 2013).

²³⁵ AKRON_000344115 (noting that “the Chinese . . . may be complicit in the sale” of “carfentanil and fentanyl”); CLEVE_000189730 (explaining that the fentanyl “problem will continue to grow due to WEB based trafficking out of China, Asian & European countries.”); CLEVE_2289957 (explaining that all of Cleveland’s “fentanyl related cases point to Mexico or China”); Martin Dep. 320:23-321:24 (explaining that China and Mexico are the two sources of fentanyl into Northeast Ohio)

²³⁶ Matt Paolino Dep. 109:5-11, 174:23-176:10 (discussing the shipment of fentanyl through the mail, and the difficulties law enforcement has in interdicting drugs through mail); Sheehan Hannan, *Our Epidemic, Fighting the Opioid Problem*, CLEVELAND MAGAZINE (Sept, 8, 2018, <https://clevelandmagazine.com/in-the-cle/our-epidemic/articles/our-epidemic-fighting-the-opioid-problem>) (discussing the difficulties of fentanyl interdiction, which is that you can order it on the internet and there are thousands of packages every day coming from China). Tackling Fentanyl: the China Connection, Hearing Before the Subcomm. on Africa, Global Health, Global Human Rights, and Internal Organizations of the H. Comm. on Foreign Affairs, 115th Cong., 115-169 (2016) (statement of Paule E. Knierim, Deputy Chief of Operations, Office of Global Enforcement, Drug Enforcement Agency) at 21 (“It is extremely difficult for the Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and Homeland Security Investigations (HSI), and the U.S. Postal

to send fentanyl because, unlike private carriers, USPS cannot collect advanced electronic data (“AED”), which would assist in tracking and identifying traffickers, for packages distributed to it from international sources.²³⁷ It is also impossible to stop and combat without the help of Chinese authorities. China only recently began regulating fentanyl and its analogs as controlled substances, but China’s new regulations will not have any practical impact on the drug’s availability in the U.S. unless those laws are enforced.²³⁸

Fentanyl is a popular drug among trafficking organizations and dealers because it is cheap to produce, easy to smuggle, potent, and highly profitable.²³⁹ Cartels have an incentive to market it and add it to other drugs because fentanyl is both cheaper and more potent than other substances, including cocaine and heroin.²⁴⁰ Fentanyl also masks dilution, and is highly

Inspection Service (USPIS) to address the [fentanyl] threat at ports of entry, due to the combination of: the questionable legal status of these substances, which are not specifically named in the CSA itself or by DEA through scheduling actions; the enormous volume of international parcel traffic by mail and express consignment couriers; and the technological and logistical challenges of detection and inspection.”).

²³⁷ Combatting the Opioid Crisis: Exploiting Vulnerabilities in International Mail, Hearing Before the Subcomm. on Investigations of the S. Comm. on Homeland Security and Governmental Affairs, 115th Cong., 115-317 (2018) (Staff Report) at 112 (describing AED); 114-115, 21 (noting that express consignment operators, such as UPS and DHL, are required to collect AED by law); 113 (“Despite the benefits of using AED to identify suspicious packages, the international postal community has failed to meaningfully adopt its use.”).

²³⁸ Sasha Ingber, *China To Close Loophole After U.S. Calls for Opioid Action*, NPR (Apr. 1, 2019, <https://www.npr.org/2019/04/01/708801717/china-to-close-loophole-on-fentanyl-after-u-s-calls-for-opioid-action>) (reporting that China had announced that it would begin regulating fentanyl analogues but that China’s ability to enforce the law is a different question); *How Did Enough Fentanyl to Kill “Every Man, Woman, and Child in Cleveland” Reach the United States?*, 60 MINUTES (Apr. 25, 2019, <https://www.cbsnews.com/news/how-did-enough-fentanyl-to-kill-every-man-woman-and-child-in-cleveland-reach-the-united-states-60-minutes/>) (reporting on a criminal case in which U.S. authorities alerted China to an illegal fentanyl operation which China refused to shut down).

²³⁹ AKRON_001143207, 1143210 (explaining that fentanyl is “cheaper to produce, more potent, highly profitable, and easier to smuggle across borders” than other drugs because you don’t need fields to grow it).

²⁴⁰ Drug Facts, *What is fentanyl?*, NATIONAL INSTITUTE OF HEALTH, <https://www.drugabuse.gov/publications/drugfacts/fentanyl> (explaining that “drug dealers are mixing fentanyl with other drugs . . . because it takes very little to produce a high with fentanyl, making it a cheaper option”); AKRON_001143207, 1143210 (noting that “fentanyl is uniquely poised to become the next ‘big idea’ on a criminal industrial scale” because it is “cheaper to produce, more potent, highly profitable, and easier to smuggle across borders”); Maggie Fox, *Why would anyone cut heroin with fentanyl? It’s cheap, these researchers say*, NBC News (Dec. 4, 2008, <https://www.nbcnews.com/storyline/americas-heroin-epidemic/why-would-anyone-cut-heroin-fentanyl-it-s-cheap-these-n943796>) (reporting that dealers are cutting fentanyl with other drugs because its cheaper than heroin, smaller, lighter, and easier to smuggle).

addictive, making it the perfect adulterant for cartels to add when cutting other drugs like heroin.²⁴¹

The more fentanyl is pushed by the cartels, the more fentanyl causes problems. Many of the dealers who sell cocaine also sell heroin, and cartels often chop and mix fentanyl and other drugs. As a result, increased fentanyl distribution increases the risk of the unintentional contamination of other drugs with fentanyl.²⁴²

Buyers often do not know whether they are buying fentanyl and many drug users are afraid of fentanyl because it poses a high risk of overdose.²⁴³ In fact, there is no slang term for fentanyl, which indicates that consumers do not seek it out, and that the increased use fentanyl is being driven by drug traffickers and cartels.²⁴⁴

²⁴¹ Drug Facts, *What is fentanyl?*, National Institute of Health, <https://www.drugabuse.gov/publications/drugfacts/fentanyl> (explaining that “drug dealers are mixing fentanyl with other drugs . . . because it takes very little to produce a high with fentanyl, making it a cheaper option”); AKRON_001143207, 1143210 (noting that “fentanyl is uniquely poised to become the next ‘big idea’ on a criminal industrial scale” because it is “cheaper to produce, more potent, highly profitable, and easier to smuggle across borders”); AKRON_001143207, 1143215 (noting that fentanyl is so powerful that it enhances heroin) Maggie Fox, *Why would anyone cut heroin with fentanyl? It's cheap, these researchers say*, NBC News (Dec. 4, 2008), <https://www.nbcnews.com/storyline/americas-heroin-epidemic/why-would-anyone-cut-heroin-fentanyl-it-s-cheap-these-n943796> (reporting that dealers are cutting fentanyl with other drugs because it is cheaper than heroin, smaller, lighter, and easier to smuggle).

²⁴² Max Daly, The Truth About Drug Dealers Lacing Cocaine with Fentanyl, VICE NEWS (Apr. 5, 2019, https://www.vice.com/en_us/article/8xyzkp/the-truth-about-drug-dealers-lacing-cocaine-with-fentanyl) (explaining that cocaine is packaged and cut multiple times during the supply chain so it is inevitable that fentanyl will be mixed with other powders like cocaine that are packaged and cut alongside it); Annamarya Scaccia, *How Fentanyl is Contaminating America's Cocaine Supply*, ROLLING STONE (Oct. 9, 2018, <https://www.rollingstone.com/culture/features/fentanyl-cocaine-how-contamination-happens-735155/>) (noting that fentanyl laced cocaine is likely the result of accidental cross contamination because sealers often package and cut different products on the same substances without properly cleaning those substances).

²⁴³ Maggie Fox, *Why would anyone cut heroin with fentanyl? It's cheap, these researchers say*, NBC News (Dec. 4, 2008, <https://www.nbcnews.com/storyline/americas-heroin-epidemic/why-would-anyone-cut-heroin-fentanyl-it-s-cheap-these-n943796>) (reporting that many “opioid users are actively afraid of fentanyl and don’t want it, because they know about the dangers of overdose”); AKRON_000236206 (identifying a growing awareness of “dealers and users” about fentanyl as a reason for decreases in drug overdoses.).

²⁴⁴ Maggie Fox, *Why would anyone cut heroin with fentanyl? It's cheap, these researchers say*, NBC NEWS (Dec. 4, 2008, <https://www.nbcnews.com/storyline/americas-heroin-epidemic/why-would-anyone-cut-heroin-fentanyl-it-s-cheap-these-n943796>) (reporting the absence of “any street slang words for fentanyl” is an “indication that demand is not driving the increased use of fentanyl”).

Fentanyl has come and gone before, and cartels largely use the same illicit drug distribution methods for fentanyl that they use for other drugs.²⁴⁵

F. Prescription Drug Trafficking Existed Before Prescription Opioids.

Based on the documents I have reviewed in this case and my experience in law enforcement, I am of the opinion to a reasonable degree of professional certainty that counterfeit prescription drugs and illicitly trafficked prescription drugs are a contributor to the drug crisis in Cuyahoga and Summit County today.

Recent intelligence from the DEA confirms that international drug cartels are currently manufacturing counterfeit prescription drugs containing fentanyl,²⁴⁶ and I understand that Summit County and Cuyahoga County are having problems with counterfeit prescription drugs laced with fentanyl that are coming from drug cartels today.²⁴⁷ In addition, I have reviewed sources indicating that international drug trafficking organizations have started to manufacture and sell counterfeit prescription opioid drugs, including OxyContin, to Northeast Ohio that are manufactured overseas.²⁴⁸

The fact that counterfeit prescription drugs and illicitly trafficked prescription drugs are causing problems today is not new and does not surprise me. During my tenure at the DEA, international drug cartels capitalized on loose prescription drugs laws in other countries to counterfeit prescription drugs and traffic them to the United States. In particular, I remember

²⁴⁵ AKRON_001143207 (DEA bulletin discussing a 2005-2006 “fentanyl overdose epidemic”); SUMMIT_000023567, 23630 (discussing a fentanyl scare that occurred on the eastern coast in the 1990s).

²⁴⁶ Intelligence Brief, *Counterfeit Prescription Pills Containing Fentanyls: A Global Threat*, DRUG ENFORCEMENT AGENCY, July 2016, at pg 1 (reporting that “[h]undreds of thousands of counterfeit prescription pills, some containing deadly amounts of fentanyls have been introduced into U.S. drug markets, exacerbating the fentanyl and opioid crisis.”); Martin Dep. 188:8-10 (testifying that the DEA has “seen pills that are in the form of Oxy 30s, Percocets, that are actually fentanyl”), 252:6-252:18 (testifying that the counterfeit pills DEA is seizing are coming from the cartels).

²⁴⁷ Johnson Rule 30(b)(6) Dep. 263:2-14 (testifying that Summit County has had instances in which drug dealers have sold counterfeit prescription drugs laced with fentanyl); Siegle Dep. 122:5-122:17 (testifying that “we have had instances where our task forces have seized what appear to be pharmaceuticals that are really fentanyl pressed to look like it.”); Leonard Dep. (Day 3) 437:16-19 (testifying that counterfeit opioid pills are part of the opioid epidemic).

²⁴⁸ Siegle Dep. 123:7-123:19 (“Q. Are there drug trafficking organizations that deal in prescription opioids, as far as you are aware? A. Yes . . . It’s usually in combination with some other narcotic. Q. So a source for some of the prescription opioids being abused in Ohio HIDTA are drug trafficking organizations; is that fair? A. That’s fair to say, yes.”); Leonard Dep. (Day 3) 436:13-18 (testifying that drug trafficking organizations are trafficking and selling diverted prescription drugs).

cartels capitalizing on loose prescription drug laws in Mexico to manufacture methamphetamines from cold medicine.

For as long as I was in DEA, the prescription drug regulations in other countries have contributed to drug abuse so it is neither new nor surprising that the drug regulations in other countries are an important contributor to the problem of non-medical prescription opioid abuse in the United States today.

G. Much Diversion of Prescription Opioids Occurs Outside the Closed System of Distribution

The vast majority of registrants act lawfully and do not engage in diversion.²⁴⁹ However, diversion can occur in many ways, including: thefts by employees from hospitals, doctors' offices, or nursing homes; armed robberies of pharmacies; night-time burglaries of pharmacies; hijackings of prescriptions in transit; use of forged or altered prescriptions; thefts from the home

²⁴⁹ MCKMDL00478906, 478908 (“DEA recognizes that the overwhelming majority of registered distributors act lawfully and take appropriate measures to prevent diversion.”); Examining the Growing Problems of Prescription Drug and Heroin Abuse, Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 113th Cong., 113-140 (2014) (testimony of Joseph T. Rannazzisi, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Administration) at 76 (“I think that if you are talking about 99.5 percent of the prescribers, no, they are not overprescribing, but our focus is in rogue pain clinics and rogue doctors who are overprescribing.”); Challenges and Solutions in the Opioid Crisis, Hearing Before the H. Comm. on the Judiciary, 115th Cong., 115-57 (2018) (testimony of Robert Patterson, Acting Administrator, Drug Enforcement Administration) at 32 (“But I go back to the fact that I look at the vast majority of doctors: 99.99 percent are all trying to do right by their patients.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 401:5-17 (“Q. As to prescription opioids, DEA believes that the overwhelming majority of prescribing in America is conducted responsibly? A. Yes, correct. Q. And DEA has stated that 99.5 percent of prescribers do not overprescribe opioids? ... A. I don’t know that we’ve said 99.5 percent. I’ve heard the figure 1 to 2 percent.”); Prevoznik Rule 30(b)(6) Dep. (Day 1) 403:14-19 (“Q. So my question for you, the initial question, was, DEA has publicly stated that 99.5 percent of prescribers are not overprescribing, correct? A. Correct.”); Prevoznik Rule 30(b)(6) Dep. (Day 2) 445:1-446:1 (“THE WITNESS: With the pharmacy diversion awareness conferences, I was with Mr. Rannazzisi at those conferences. And when we did the presentation, so that was from -- when I joined -- when I went to headquarters in April 2012, Atlanta was the first PDAC that I went to. So from that point on, pretty much every time that we had a presentation, we would say 1 to 2 percent [of prescribers diverted opioids]. So that is the figure that I know of, 1 to 2 percent. ... Q. Okay. Would you agree then that not all registrants distributed controlled substance to the 1 or 2 percent of prescribers who diverted opioids from 2005 to 2018? ... [A.] I would be speculating on that, but, yes.”); Ashley Dep. 329:14-22 (“Q. In your, frankly, remarkable career of rising from a secretary all the way up to an executive at DEA, isn’t it the case, Ms. Ashley, that the vast majority of registrants with whom you dealt were trying to comply with the CSA and the implementing regs? ... [A.] I agree with that, yes.”).

by family, friends, or strangers.²⁵⁰ All of these types of diversion happen outside the closed system of distribution and outside of the control of registrants. In fact, DEA has repeatedly acknowledged that the “most frequent method of obtaining a pharmaceutical controlled substance for non-medical use” is from “friends and family … for free!!”²⁵¹

H. Individual Bad Actors Responsible for Opioid-Related Problems in Cuyahoga County and Summit County

As examples of the trends and factors I describe above, there are numerous individual bad actors that are responsible for the opioid-related problems in Cuyahoga County and Summit County—including employees of the plaintiffs themselves. Appendix A provides a summary of individuals (who are not parties to this case) who have been indicted, convicted, sued, disciplined, or otherwise found or allegedly found responsible for misconduct involving prescription opioids or illicit opioids in Cuyahoga County or Summit County since 1996. This includes at least 42 medical doctors, medical clinics, and other prescribers who have engaged or allegedly engaged in conduct related to improperly prescribing or diverting prescription opioids; at least 17 pharmacies, pharmacists, and pharmacy technicians who have engaged or allegedly engaged in conduct related to improperly dispensing or diverting prescription opioids; at least 460 additional individuals who have engaged or allegedly engaged in conduct related to diversion of prescription opioids, such as theft, forgery of prescriptions, re-sale or gifting of prescription opioids received through a prescription, or the acquisition of multiple prescriptions through “doctor-shopping”; and at least 701 individuals have engaged or allegedly engaged in conduct related to trafficking of illegal opioids, including (among others) heroin, fentanyl, and carfentanil. The documents cited in Appendix A therefore show widespread illegal and

²⁵⁰ Drug Enforcement Administration, Controlled Substance and Legend Drug Diversion; A Law Enforcement and Regulatory Perspective, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2014/sept_2014/rannazzisi.pdf (2014) (last visited May 29, 2019) at 162 (describing “Methods of Diversion” in presentation to pharmacists); Martin Dep. 191:3-196:19 (confirming that “theft of prescription opioids from a delivery truck,” theft from a pharmacy,” “theft from a hospital,” “pill sharing,” “doctor shopping,” and “forged prescriptions” are all forms of diversion).

²⁵¹ Drug Enforcement Administration, Drug Trends, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2012/march_2012/drug_trends_0329.pdf (2012) (last visited May 29, 2019) at 25; Drug Enforcement Administration, DEA Perspective: Pharmaceutical Use & Abuse, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2013/august_2013/prevoznik.pdf (2013) (last visited May 29, 2019) at 14; Drug Enforcement Administration, DEA Perspective: Pharmaceutical Use & Abuse, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2014/july_2014/prevoznik.pdf (last visited May 29, 2019) at 29; Drug Enforcement Administration, DEA Trends & Update, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2017/aug5_2017/carrion.pdf (2017) (last visited May 29, 2019) at 27; DEA’s 17th National Prescription Drug Take Back Day Yields Fruitful Results in Georgia (2019), <https://www.dea.gov/press-releases/2019/05/06/deas-17th-national-prescription-drug-take-back-day-yields-fruitful> (last visited May 29, 2019) (“Studies show that a majority of abused prescription drugs are obtained from family and friends, including from the home medicine cabinet.”);

professionally improper conduct in Summit County and Cuyahoga County that is the direct cause of abuse of prescription opioids. Here are just a few examples:

1. Prescribing Practitioners

a) Dr. Gregory Ingram

Dr. Gregory Ingram, a medical doctor working at Akron General Medical Center's Emergency Department in Akron, Ohio, was indicted on May 28, 2015 in the Northern District of Ohio on charges including distributing oxycodone, hydromorphone, Roxicet, and tramadol outside the usual course of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C). According to the indictment, Dr. Ingram traded the illegal prescriptions for money and sexual favors, including with contacts that he met at dancing and strip clubs, between November 2012 and October 2014. Dr. Ingram pled guilty to all charges, and his own sentencing memorandum acknowledged that "he had become the equivalent of a drug dealer." He was then sentenced to one year in prison.²⁵²

b) Dr. Lorenzo Lalli

Dr. Lorenzo Lalli, a medical doctor practicing in Cleveland, Ohio, pled guilty on June 16, 2014 to offenses including trafficking, for operating a pill mill out of his medical office and for selling prescriptions for powerful painkillers and other pharmaceutical drugs. On July 29, 2014, Dr. Lalli was sentenced to one year in prison and ordered to forfeit \$220,000. Dr. Lalli had earlier (in November 2013) surrendered his medical license to the Medical Board in lieu of further investigation or formal disciplinary charges.²⁵³ Dr. Lalli was identified in the 30(b)(6) deposition of Cuyahoga County, through designee Assistant Cuyahoga County Prosecutor James A. Gutierrez, as a doctor who was prosecuted for misconduct related to prescription opioids.

c) The Medical Care Group

The Medical Care Group, a medical clinic chain, which has had offices in Cleveland, North Olmsted, Parma, Euclid, and Warrensville Heights, Ohio, was fined \$12,500 in April 2017 for charges relating to a doctor-employee's handing out prescription opioids without an examination or monitoring of the individuals requesting them.²⁵⁴

2. Pharmacies, Pharmacists, and Pharmacy Technicians

a) Michael Baker

²⁵² MCKPUB00000068; MCKPUB00000071; MCKPUB00000065; MCKPUB00024537.

²⁵³ CLEVE_001486342; MCKPUB00000304; MCKPUB00000306; MCKPUB00024546; Summit County & City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories, at 6.

²⁵⁴ MCKPUB00000362; MCKPUB00000365; MCKPUB00003647.

Michael Baker was licensed to practice pharmacy in Ohio. During an investigation, video cameras recorded Mr. Baker stealing drugs at Heritage Square Pharmacy on two occasions on January 28, 2015. When confronted by investigators, Mr. Baker had oxycodone pills that had not been legally prescribed on his person and admitted that he had stolen hydrocodone and oxycodone from the pharmacy for at least one year. On August 5, 2015, the Board of Pharmacy indefinitely suspended Mr. Baker's license to practice pharmacy.²⁵⁵ On September 12, 2017, Mr. Baker's license was reinstated subject to terms of probation.²⁵⁶ In an interrogatory response, Plaintiffs Summit County and the City of Akron named Mr. Baker as a pharmacist who was investigated in August 2015 for the diversion of prescription opioids, in relation to Heritage Square Pharmacy.²⁵⁷

b) Robert J. Roth

Robert J. Roth was licensed to practice pharmacy in Ohio. Mr. Roth was indicted on February 28, 2018 for offenses including intentionally creating and/or knowingly possessing a false or forged prescription in violation of Ohio Rev. Code § 2925.25(B)(1). He was charged with forging a prescription for hydrocodone homatropine cough syrup on May 13, 2014, while he was a pharmacist at Parkway Pharmacy in Cleveland, Ohio. Mr. Roth pled guilty on June 26, 2018 in the Cuyahoga County Court of Common Pleas, and he was sentenced to six days of community control and one hundred hours of community service. Under his plea agreement, Mr. Roth also was required to surrender his pharmacy license and sell his interest in Parkway Pharmacy.²⁵⁸

3. Individuals and Entities Involved in Diversion of Prescription Opioids

a) Rebecca Jo Collen, R.N.

Rebecca Jo Collen, R.N. had her license to practice nursing indefinitely suspended by the Board of Nursing on July 31, 2015. While working as a nurse at the Cleveland Clinic in Cleveland, Ohio, Ms. Collen diverted fentanyl by using a sterile syringe to remove fentanyl from intravenous therapy ("IV") bags that were hung for administration to patients.²⁵⁹

b) Kathleen A. Burgan

Kathleen A. Burgan of Cleveland, Ohio pled guilty on February 7, 2014 in the Cuyahoga County Court of Common Pleas to offenses including deception to obtain a dangerous drug,

²⁵⁵ SUMMIT_002053458.

²⁵⁶ MCKPUB00000727.

²⁵⁷ Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen, at 5.

²⁵⁸ CUYAH_000080214; MCKPUB00000807; MCKPUB00000808; MCKPUB00000810.

²⁵⁹ OBN_MDL 1st Production 074923, at OBN_MDL 1st Production 076435; MCKPUB00005188.

namely Percocet. According to a police report, Ms. Burgan filled multiple fraudulent prescriptions for Percocet at a pharmacy in Cleveland, all printed on stock copy paper with black grease smudges; Detective John Prince noted his belief that the suspect or her co-conspirators “intentionally attempted to corrupt the prescriptions in order to make them look worn and draw less scrutiny from a diligent Pharmacist.” Ms. Burgan was sentenced to one year of community control.²⁶⁰

c) Lisa A. Rzeszotarski

Lisa A. Rzeszotarski of New Franklin, Ohio pled guilty on March 16, 2015 in the Summit County Court of Common Pleas to deception to obtain a dangerous drug, namely oxycodone. She obtained controlled narcotics from at least 32 physicians in the Akron area over twelve months. Ms. Rzeszotarski was sentenced to one year in prison, suspended provided that she complete eighteen months of community control.²⁶¹

d) Alexander Linton

Alexander Linton of Cuyahoga Falls, Ohio pled guilty on March 1, 2016 in the Summit County Court of Common Pleas to robbery of oxycodone. Mr. Linton robbed pharmacies in Stow, Cuyahoga Falls, and Akron, stealing oxycodone and oxymorphone pills at gunpoint. Linton was sentenced to twelve years in prison.²⁶² Plaintiffs Summit County and the City of Akron identified Mr. Linton as someone under investigation for diversion.²⁶³

4. Individuals and Entities Involved in Distribution and Sale of Illegal Opioids

a) Stephen A. Thomas

Stephen A. Thomas of Maple Heights, Ohio, a corrections officers at Cuyahoga County Jail, was indicted on May 16, 2019 in the Cuyahoga County Court of Common Pleas on counts including illegal conveyance of drugs of abuse onto grounds of a governmental facility,

²⁶⁰ CLEVE_004083991; MCKPUB00024731; MCKPUB00024733; MCKPUB00024736.

²⁶¹ AKRON_001283454; MCKPUB00025234; MCKPUB00025235-25237; MCKPUB00025238-25241.

²⁶² AKRON_000337173; AKRON_000337174; MCKPUB00025075; MCKPUB00025076; MCKPUB00025078; MCKPUB00025079; MCKPUB00025081; MCKPUB00025082; MCKPUB00025084; MCKPUB00025086; MCKPUB00025088.

²⁶³ Summit County and City of Akron, Ohio Plaintiff’s Replacement Supplemental Responses and Objections to Manufacturer Defendants’ Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29, at 240; Summit County and City of Akron, Ohio Plaintiff’s Supplemental Responses and Objections to Distributor Defendants’ Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29, at 41; Summit County and City of Akron, Ohio Plaintiff’s Supplemental Responses and Objections to National Retail Pharmacy Defendants’ Interrogatory Nos. 4, 7, 15, 16 & 19, at 28.

trafficking in a fentanyl-related compound, trafficking in heroin, and corrupting another with drugs.²⁶⁴ Mr. Thomas is accused of smuggling heroin and a fentanyl-related compound into Cuyahoga County Jail for the purpose of selling it to inmates, and selling it to inmates including to Kelly Angle on January 18, 2019, who overdosed but lived, and David Sowell on May 8, 2019.²⁶⁵ On May 8, 2019, Mr. Thomas was seen on surveillance video going into Mr. Sowell's cell and selling him the opioids; Mr. Thomas was arrested later that day.²⁶⁶ Cuyahoga County Assistant Prosecutor Matthew Meyer said in a court hearing that investigators have evidence that Mr. Thomas was part of a larger drug- and contraband-smuggling ring.²⁶⁷ The case against Mr. Thomas is pending.²⁶⁸

b) Antoin Austin

Antoin Austin of Euclid, Ohio pled guilty on July 24, 2018 in the Northern District of Ohio to conspiracy to distribute controlled substances, including fentanyl and fentanyl analogues, attempted possession with intent to distribute fentanyl, distribution of a controlled substance by means of the internet, advertising controlled substances by means of the internet, maintaining a drug-involved premises, and maintaining a drug-involved premises near a school.²⁶⁹ From August 1, 2017 through March 28, 2018, Mr. Austin sold fentanyl on the dark web from his home.²⁷⁰ Mr. Austin ordered thousands of deadly doses of fentanyl from China.²⁷¹ On November 5, 2018, Mr. Austin was sentenced to two years' imprisonment.²⁷²

c) Gerald Bowerman

Gerald Bowerman of Cuyahoga Falls, Ohio pled guilty on August 17, 2018 in the Northern District of Ohio to conspiracy to possess with intent to distribute fentanyl.²⁷³ On April 17, 2018, law enforcement officers surveilled Mr. Bowerman coming and going from an Akron, Ohio residence. Law enforcement observed Mr. Bowerman carrying a package with him into the home. They executed a search warrant at the residence later that day and recovered pills on the kitchen counter next to an empty U.S. Postal Service package. The pills were stamped to look like oxycodone but were fentanyl and cutting agents. In announcing the indictment, U.S. Attorney Justin E. Herdman stated, "These arrests helped save at least 1,500 lives." At the same

²⁶⁴ CUYAH_002399328; MCKPUB00029992.

²⁶⁵ MCKPUB00029986; MCKPUB00029992.

²⁶⁶ MCKPUB00029988.

²⁶⁷ *Id.*

²⁶⁸ MCKPUB00029985.

²⁶⁹ MCKPUB00006964; MCKPUB00006957.

²⁷⁰ MCKPUB00006957.

²⁷¹ MCKPUB00006978.

²⁷² MCKPUB00006966; MCKPUB00006974; MCKPUB00006981.

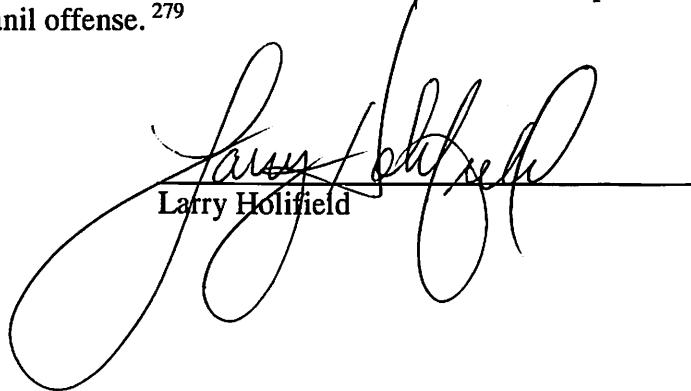
²⁷³ MCKPUB00013570.

time, Akron Police Chief Kenneth Ball described the defendants as “criminal predators [who] were willing to put so many at great risk by poisoning prescription drugs with fentanyl.”²⁷⁴ Mr. Bowerman is awaiting sentencing.²⁷⁵

d) Da’Nico D. Geter

Da’Nico D. “Dupree” Geter of Akron, Ohio has multiple convictions for trafficking illegal opioids. Mr. Geter pled guilty on August 12, 2014 in the Summit County Court of Common Pleas to trafficking in heroin, and he was sentenced to six months in prison. On April 7, 2016, Mr. Geter was convicted of trafficking in heroin, and he was sentenced to eighteen months in prison. On October 6, 2017, Mr. Geter was indicted in the Summit County Court of Common Pleas on multiple charges, including aggravated trafficking in drugs and possession of drugs, including fentanyl. The indictment was dismissed because Mr. Geter was indicted in the Northern District of Ohio on January 10, 2018. On March 23, 2018, Mr. Geter pled guilty to possession with intent to distribute carfentanil and possession of a firearm in furtherance of drug trafficking.²⁷⁶ During sentencing, the judge noted that Mr. Geter was a “career offender,” and the “organizer, leader, manager, or supervisor” of his drug trafficking operations. Moreover, the sentencing judge observed that Mr. Geter’s criminal history showed that “each time [he’s] been incarcerated, [he’s] turned back to the same type of dealing.”²⁷⁷ Upon learning that Mr. Geter was pleading guilty, Akron Chief of Police Kenneth Ball said that “310 people have died as a result of drug overdoses in Akron since the start of 2016. Drug dealers like Da’Nico Geter are largely responsible.”²⁷⁸ Mr. Geter was sentenced on June 7, 2018 to 300 months in prison, including 240 months for the carfentanil offense.²⁷⁹

Dated: May 31, 2019


Larry Holifield

²⁷⁴ MCKPUB00013583.

²⁷⁵ MCKPUB00013572; MCKPUB00013575; MCKPUB00013581.

²⁷⁶ AKRON_000201619; MCKPUB00009238; MCKPUB00009240; MCKPUB00009241; MCKPUB00009242; MCKPUB00009244; MCKPUB00009245; MCKPUB00009246; MCKPUB00009248; MCKPUB00009249; MCKPUB00009250; MCKPUB00009252; MCKPUB00009254; MCKPUB00009235.

²⁷⁷ MCKPUB00029398.

²⁷⁸ AKRON_000325481.

²⁷⁹ MCKPUB00026700; MCKPUB00009255; MCKPUB00009257; MCKPUB00009262; MCKPUB00009263.

APPENDIX A

APPENDIX A

I. Prescribers Involved In The Diversion Of Prescription Opioids

At least 42 medical doctors, medical clinics, and other prescribers in Cuyahoga and Summit Counties: (1) were indicted, with pending charges (4 individuals or entities); (2) were convicted or pled guilty (13 individuals); (3) had their medical licenses suspended or revoked, or otherwise faced investigatory or disciplinary action from Ohio state agencies (17 individuals or entities); (4) were sued for medical malpractice (4 individuals); (5) were sued for civil injunctions by the U.S. Department of Justice (2 individuals); and/or (6) were identified by plaintiffs in this litigation as having faced prosecution or disciplinary action or as a contributor to the alleged opioid crisis (13 individuals or entities), all for conduct related to improperly prescribing or diverting prescription opioids.¹

	Name	Sources
1.	Dr. Syed Jawed Akhtar-Zaidi	<ul style="list-style-type: none"> • MCKPUB00000431 • MCKPUB00000506 • MCKPUB00000508 • MCKPUB00000509 • MCKPUB00004599
2.	Dr. Haitham Azem	<ul style="list-style-type: none"> • MCKPUB00000072 • MCKPUB00000073 • MCKPUB00000077 • MCKPUB00000079
3.	Dr. Stephen Bernie	<ul style="list-style-type: none"> • CUYAH_000071691 • MCKPUB00000418 • MCKPUB00000421 • MCKPUB00000422 • MCKPUB00000424 • MCKPUB00000429 • MCKPUB00003647 • MCKPUB00029060
4.	Dr. Toni Carman	<ul style="list-style-type: none"> • MCKPUB00000522 • MCKPUB00000525 • MCKPUB00004599 • MCKPUB00024496

¹ The numbers provided for each category add up to more than the total because individuals or entities sometimes fall into more than one category, e.g., the individual or entity both was convicted and professionally disciplined.

	Name	Sources
5.	Dr. Ronald Celeste	<ul style="list-style-type: none"> • MCKPUB00000393 • MCKPUB00000395 • MCKPUB00024498
6.	Dr. Thomas L. Craig III	<ul style="list-style-type: none"> • MCKPUB00000509 • MCKPUB00000513 • MCKPUB00000514 • MCKPUB00000519 • MCKPUB00024499
7.	Dr. David Carl Ernst	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00018962 • MCKPUB00024501
8.	Dr. Matthew Henry Evenhouse	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00003769 • Ohio_State_Medical_Board_00009060 •
9.	Dr. Bruce Feldman	<ul style="list-style-type: none"> • MCKPUB00000042 • MCKPUB00000044
10.	Dr. Maged Fouad	<ul style="list-style-type: none"> • Summit County and the City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories
11.	Dr. Gregory Gerber	<ul style="list-style-type: none"> • MCKPUB00024505 • Ohio BOPMDL044632 • City of Cleveland's Amended and Supplemental Responses and Objections to Distributor Defendants' Interrogatories • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatories • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29

	Name	Sources
12.	Dr. Marcellus JaJuan Gilreath	<ul style="list-style-type: none"> • MCKPUB00000307 • MCKPUB00000359
13.	Dr. Aimee Haber	<ul style="list-style-type: none"> • MCKPUB00024509
14.	Dr. Ghassan Haddad	<ul style="list-style-type: none"> • MCKPUB00000052 • MCKPUB00000056 • MCKPUB00000058 • MCKPUB00000059
15.	Dr. Adolph Harper, Jr	<ul style="list-style-type: none"> • MCKPUB00000001 • MCKPUB00000004 • MCKPUB00000007 • MCKPUB00000024 • MCKPUB00024512 • MCKPUB00004923 • Summit County & City of Akron, Ohio Plaintiff First Amended Responses and Objections to Distributor Defendants' First Set of Interrogatories
16.	Dr. Brian Heim	<ul style="list-style-type: none"> • MCKPUB00000033 • MCKPUB00000036 • MCKPUB00000039 • MCKPUB00000041 • MCKPUB00024532 • MCKPUB00024533 • Summit County & City of Akron, Ohio Plaintiff First Amended Responses and Objections to Distributor Defendants' First Set of Interrogatories • Plaintiffs' Responses to the Amended and Clarified Discovery Ruling 12 Supplemental Interrogatory Issued to Plaintiffs • City of Cleveland's Amended and Supplemental Responses and Objections to Distributor Defendants' Interrogatories

	Name	Sources
		<ul style="list-style-type: none"> • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatories • Cuyahoga County's Replacement Supplemental Response and Objections to Manufacturer Defendants' Interrogatories • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
17.	Dr. Juan Hernandez	<ul style="list-style-type: none"> • MCKPUB00000105
18.	Dr. William Husel	<ul style="list-style-type: none"> • MCKPUB0002378
19.	Dr. Gregory Ingram	<ul style="list-style-type: none"> • MCKPUB00000065 • MCKPUB00000068 • MCKPUB00000071 • MCKPUB00024537
20.	Dr. John Kavlich III	<ul style="list-style-type: none"> • MCKPUB00000097 • MCKPUB00000100 • MCKPUB00000103
21.	Matthew D. Kellems	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00034118
22.	Dr. William Balint Kerek	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00005249 • Ohio_State_Medical_Board_00092678
23.	Dr. Tony Lababidi	<ul style="list-style-type: none"> • Summit County and the City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and

	Name	Sources
		the National Retail Pharmacy Defendants' First Set of Interrogatories
24.	Dr. Lorenzo Lalli	<ul style="list-style-type: none"> • CLEVE_001486342 • MCKPUB00000304 • MCKPUB00000306 • MCKPUB00024546 • Summit County & City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories
25.	Dr. Frank Lazzerini	<ul style="list-style-type: none"> • Summit County and the City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories
26.	Dr. Joseph Francis Lydon, Jr.	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00016487 • MCKPUB00024548
27.	Dr. Mark S. McAllister	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00000830
28.	The Medical Care Group	<ul style="list-style-type: none"> • MCKPUB00000362 • MCKPUB00000365 • MCKPUB00003647
29.	Dr. John Nickels	<ul style="list-style-type: none"> • Summit County and the City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories

	Name	Sources
30.	Dr. Samuel Nigro	<ul style="list-style-type: none"> • CUYAH_000054406 • MCKPUB00000398 • MCKPUB00000401 • MCKPUB00000403 • MCKPUB00000406 • MCKPUB00000408
31.	Dr. Charles Chiedo Njoku	<ul style="list-style-type: none"> • Summit County and City of Akron, Ohio Plaintiffs' First Amended Responses and Objections to the National Retail Pharmacy Defendants' First Set of Interrogatories
32.	Northeast Ohio Pain Clinic	<ul style="list-style-type: none"> • Cuyahoga County (Gilson) Deposition Transcript
33.	Dr. Jayati Gupta Rakhit	<ul style="list-style-type: none"> • MCKPUB00000024
34.	Dr. Ashis K. Rakhit	<ul style="list-style-type: none"> • MCKPUB00000030
35.	Dr. Rakesh Ranjan	<ul style="list-style-type: none"> • SUMMIT_001444018 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
36.	Dr. George Smirnoff	<ul style="list-style-type: none"> • MCKPUB00000047 • Gutierrez Deposition Transcript
37.	Dr. Kutaiba Tabaa	<ul style="list-style-type: none"> • MCKPUB00000294 • MCKPUB00000297 • MCKPUB00000300 • MCKPUB00000301

	Name	Sources
38.	Dr. Margy Temponeras	<ul style="list-style-type: none"> • CUYAH_009529668 • MCKPUB00024559 • City of Cleveland's Amended and Supplemental Responses and Objections to Distributor Defendants' Interrogatories • Cuyahoga County's Supplemental Interrogatory Responses and Objections to Distributor Defendants' Interrogatories • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
39.	Dr. Michael P. Tricaso	<ul style="list-style-type: none"> • MCKPUB00000367 • MCKPUB00000383 • MCKPUB00000386 • MCKPUB00000388
40.	Dr. Herman Weaver	<ul style="list-style-type: none"> • MCKPUB00023800 • MCKPUB00023801 • MCKPUB00023806
41.	Dr. Richard Mark Weil	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00034118 • MCKPUB00024569
42.	Dr. Jerome Yokiell	<ul style="list-style-type: none"> • Ohio_State_Medical_Board_00088369 • Summit County and the City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories

II. Pharmacies, Pharmacists, And Pharmacy Technicians Involved In The Diversion Of Prescription Opioids

At least 17 pharmacies, pharmacists, and pharmacy technicians in Cuyahoga and Summit Counties: (1) were convicted or pled guilty (6 individuals); (2) had their licenses to practice pharmacy suspended or revoked (16 individuals or entities); and/or (3) were identified by plaintiffs in this litigation as the subjects of investigation (12 individuals or entities), all for conduct related to improperly dispensing or diverting prescription opioids.

	Name	Sources
1.	Michael Baker	<ul style="list-style-type: none"> • MCKPUB00000727 • SUMMIT_002053458 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
2.	Thomas Lawrence Bridge	<ul style="list-style-type: none"> • SUMMIT_002053119 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
3.	Steven J. Brownsberger	<ul style="list-style-type: none"> • MCKPUB00000814 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
4.	Chesterfield Pharmacy	<ul style="list-style-type: none"> • MCKPUB00000551 • SUMMIT_002053165 • Plaintiff the City of Cleveland's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
5.	Jill Kristen Caruso	<ul style="list-style-type: none"> • MCKPUB00000634 • SUMMIT_002053360 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
6.	Kevin Chakos	<ul style="list-style-type: none"> • BOP_MDL053938 • Ohio BOP00003192

	Name	Sources
7.	Emil Dontenville	<ul style="list-style-type: none"> • MCKPUB00024575 • Ohio BOP00008824
8.	William David Hipp	<ul style="list-style-type: none"> • MCKPUB00000881 • SUMMIT_002053323 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
9.	John H. Lafferty	<ul style="list-style-type: none"> • MCKPUB00000664 • SUMMIT_002053107 • SUMMIT_002053116 • Plaintiff the City of Cleveland's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
10.	Imogene Carol Maynard	<ul style="list-style-type: none"> • MCKPUB00000577 • MCKPUB00000578 • MCKPUB00000580 • MCKPUB00000586 • SUMMIT_002052981 • SUMMIT_002052990 • Plaintiff the City of Cleveland's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
11.	George W. Mock	<ul style="list-style-type: none"> • BOP_MDL053938 • Ohio BOP00004100

	Name	Sources
12.	Suellen Ogden	<ul style="list-style-type: none"> • MCKPUB00000869 • MCKPUB00000871 • MCKPUB00000873 • SUMMIT_002052993 • SUMMIT_002053021 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
13.	Robert W. Przytulski	<ul style="list-style-type: none"> • SUMMIT_002053080 • Cuyahoga County, Ohio Plaintiff Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen
14.	Christopher A. Richard	<ul style="list-style-type: none"> • AKRON_000338159 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
15.	Robert J. Roth	<ul style="list-style-type: none"> • CUYAH_000080214 • MCKPUB00000807 • MCKPUB00000808 • MCKPUB00000810 • MCKPUB00000812
16.	Anthony Savoca	<ul style="list-style-type: none"> • MCKPUB00000527 • MCKPUB00000529 • MCKPUB00000531 • Ohio BOP00000690 • SUMMIT_002052964 • Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen

	Name	Sources
17.	Michelle M. Solnosky	<ul style="list-style-type: none"> • MCKPUB0000759 • SUMMIT_002053029

III. Individuals Involved In The Diversion of Prescription Opioids

At least 460 individuals in Cuyahoga and Summit Counties: (1) were indicted, with pending charges (5 individuals); (2) were convicted or pled guilty (312 individuals); (3) had their licenses to practice nursing or dentistry suspended, revoked, or voluntarily inactivated/retired (216 individuals); and/or (4) were identified by plaintiffs in this litigation as subjects of investigation (10 individuals), all for conduct related to diversion of prescription opioids, such as theft, forgery of prescriptions, re-sale or gifting of prescription opioids received through a prescription, or the acquisition of multiple prescriptions through “doctor-shopping.”

	Name	Sources
1.	Caitlin Ann Abramovich	<ul style="list-style-type: none"> • MCKPUB00001625 • OBN_MDL 1st Production 11399 • OBN_MDL 1st Production 107561 • OBN_MDL 1st Production 161275
2.	Hether M. Adriano	<ul style="list-style-type: none"> • AKRON_001157373 • MCKPUB00024588 • MCKPUB00024589 • MCKPUB00024591
3.	Joana Agosta	<ul style="list-style-type: none"> • CUYAH_000038870 • MCKPUB00024595 • MCKPUB00024597 • MCKPUB00024601
4.	Sandra J. Alamo	<ul style="list-style-type: none"> • CLEVE_004084859 • MCKPUB00024603 • MCKPUB00024605 • MCKPUB00024608
5.	Jamie L. Aleck	<ul style="list-style-type: none"> • MCKPUB00024610 • MCKPUB00024612 • MCKPUB00024618

	Name	Sources
6.	Marchaz Alexander	<ul style="list-style-type: none"> • CUYAH_000068893 • CUYAH_000073557 • MCKPUB00004185 • MCKPUB00004186 • MCKPUB00004188 • MCKPUB00004190 • MCKPUB00004191 • MCKPUB00004193
7.	Nikole M. Ambriola	<ul style="list-style-type: none"> • MCKPUB00004861 • OBN_MDL 1st Production 016725
8.	Mychael Andrews	<ul style="list-style-type: none"> • AKRON_001237601 • MCKPUB00024620 • MCKPUB00024624 • MCKPUB00024625
9.	Michele J. Antonio	<ul style="list-style-type: none"> • OBN_MDL 1st Production 160421 • OBN_MDL 1st Production 043086
10.	Catherina Marie Antonelli	<ul style="list-style-type: none"> • MCKPUB00001789
11.	Tillman Appling	<ul style="list-style-type: none"> • CUYAH_000032685 • MCKPUB00006026 • MCKPUB00006027 • MCKPUB00006033
12.	Orville E. Arbogast	<ul style="list-style-type: none"> • CUYAH_000034712 • MCKPUB00004882 • MCKPUB00004885 • MCKPUB00004886
13.	Julie M. Arnold	<ul style="list-style-type: none"> • OBN_MDL 1st Production 140843 • MCKPUB00003294

	Name	Sources
14.	Patricia Arnold	<ul style="list-style-type: none"> • MCKPUB00004916 • MCKPUB00004919 • MCKPUB00024627 • MCKPUB00024663 • MCKPUB00024674
15.	Andrew K. Ashcraft	<ul style="list-style-type: none"> • CUYAH_000073599 • MCKPUB00001112 • MCKPUB00001113 • MCKPUB00001117
16.	Nicole Maree Ashworth	<ul style="list-style-type: none"> • OBN_MDL 1st Production 110764 • MCKPUB00004793
17.	Paul Aspery	<ul style="list-style-type: none"> • CUYAH_000036803 • MCKPUB00004930 • MCKPUB00004931 • MCKPUB00004935
18.	Michael Charles Atkins	<ul style="list-style-type: none"> • MCKPUB00004469 • OBN_MDL 1st Production 059516 • OBN_MDL 1st Production 156153
19.	Gina Marie Atwood	<ul style="list-style-type: none"> • MCKPUB00002718 • OBN_MDL 1st Production 107561
20.	Stacy Lynne Azbell	<ul style="list-style-type: none"> • MCKPUB00005723 • OBN_MDL 1st Production 085996
21.	Christina Badinski	<ul style="list-style-type: none"> • CUYAH_000073406 • MCKPUB00001894 • MCKPUB00001896 • MCKPUB00001900
22.	James L. Bailey	<ul style="list-style-type: none"> • MCKPUB00024676 • MCKPUB00024678 • MCKPUB00024683

	Name	Sources
23.	Eric J. Baldridge	<ul style="list-style-type: none"> • AKRON_001272589 • MCKPUB00024685 • MCKPUB00024688 • MCKPUB00024689
24.	Caren M. Ball	<ul style="list-style-type: none"> • AKRON_001216450 • MCKPUB00024690 • MCKPUB00024692 • MCKPUB00024693
25.	Susan Ballish	<ul style="list-style-type: none"> • CUYAH_000039318 • MCKPUB00005783 • MCKPUB00005784 • MCKPUB00005787
26.	Maegan Balog	<ul style="list-style-type: none"> • OBN_MDL 1st Production 132477
27.	Marvin Barrett	<ul style="list-style-type: none"> • CUYAH_000040379 • MCKPUB00004234 • MCKPUB00004235 • MCKPUB00004238
28.	Eddie A. Bates	<ul style="list-style-type: none"> • AKRON_000226538 • MCKPUB00002565 • MCKPUB00002568
29.	Susan Battaglia	<ul style="list-style-type: none"> • CUYAH_000045101 • MCKPUB00005839
30.	Jon R. Bauer II	<ul style="list-style-type: none"> • AKRON_000220427 • MCKPUB00003257 • MCKPUB00003260
31.	Kimberly Lynn Bauer	<ul style="list-style-type: none"> • OBN_MDL 1st Production 001828 • OBN_MDL 1st Production 150868

	Name	Sources
32.	April Sharice Beasley	<ul style="list-style-type: none"> • MCKPUB00001339 • OBN_MDL 1st Production 098951
33.	Jessie R. Bedocs	<ul style="list-style-type: none"> • MCKPUB00003197 • OBN_MDL 1st Production 083864
34.	Jason E. Bell	<ul style="list-style-type: none"> • MCKPUB00002968 • MCKPUB00002969 • MCKPUB00002972 • MCKPUB00002974 • OBN_MDL 1st Production 074923
35.	Christy Belt	<ul style="list-style-type: none"> • CUYAH_000024200 • MCKPUB00001962
36.	Melissa K. Bentley	<ul style="list-style-type: none"> • MCKPUB00004440 • MCKPUB00004441 • MCKPUB00004444 • OBN_MDL 1st Production 018725
37.	Sabrina L. Berkley	<ul style="list-style-type: none"> • CUYAH_000039993 • MCKPUB00005437 • MCKPUB00005439 • MCKPUB00005442
38.	Brian D. Berlin	<ul style="list-style-type: none"> • CUYAH_000068976 • MCKPUB00001580 • MCKPUB00001581 • MCKPUB00001584
39.	Tequila Berry	<ul style="list-style-type: none"> • MCKPUB00005900 • MCKPUB00005903 • Summit County & City of Akron, Ohio Plaintiff First Amended Responses and Objections to Distributor Defendants' First Set of Interrogatories

	Name	Sources
40.	Cassandra Biddulph	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00001776 • MCKPUB00001777 • MCKPUB00001780
41.	Paul R. Blakeley	<ul style="list-style-type: none"> • MCKPUB00004943 • OBN_MDL 1st Production 062107
42.	Susan Dawn Blazeff	<ul style="list-style-type: none"> • OBN_MDL 1st Production 014736 • OBN_MDL 1st Production 021117 • MCKPUB00005790
43.	Kristen M. Boal	<ul style="list-style-type: none"> • OBN_MDL 1st Production 023282
44.	Asher G. Bobrosky	<ul style="list-style-type: none"> • MCKPUB00024694 • MCKPUB00024696 • MCKPUB00024699 • MCKPUB00024701 • MCKPUB00024703 • MCKPUB00024705
45.	William E. Booker	<ul style="list-style-type: none"> • CUYAH_000042946 • MCKPUB00006185 • MCKPUB00006186 • MCKPUB00006188
46.	Kimberly Boino	<ul style="list-style-type: none"> • CUYAH_000038080 • MCKPUB00003649 • MCKPUB00003650 • MCKPUB00003652
47.	Linroy Bottoson-Cox	<ul style="list-style-type: none"> • CUYAH_000055865 • MCKPUB00004017 • MCKPUB00004018 • MCKPUB00004021

	Name	Sources
48.	David H. Bowins	<ul style="list-style-type: none"> • CUYAH_000068976 • MCKPUB00002277 • MCKPUB00002280 • MCKPUB00002281
49.	Joseph Bowins	<ul style="list-style-type: none"> • CUYAH_000068976 • MCKPUB00003272 • MCKPUB00003273 • MCKPUB00003276
50.	Angela Kay Boyd	<ul style="list-style-type: none"> • AKRON_001280817 • MCKPUB00024707 • MCKPUB00024708 • MCKPUB00024711
51.	Reid Christian Boyer	<ul style="list-style-type: none"> • OBN_MDL 1st Production 085996 • MCKPUB00028911
52.	Bobbie Boylan	<ul style="list-style-type: none"> • CUYAH_000039531 • MCKPUB00001508 • MCKPUB00001509 • MCKPUB00001511
53.	Nathan Bozeman	<ul style="list-style-type: none"> • CUYAH_000040415 • MCKPUB00004764 • MCKPUB00004765 • MCKPUB00004768
54.	James Brewer	<ul style="list-style-type: none"> • CLEVE_004086059 • MCKPUB00024713 • MCKPUB00024715 • MCKPUB00024720
55.	James Robert Brent	<ul style="list-style-type: none"> • MCKPUB00002929 • OBN_MDL 1st Production 049841
56.	Michael D. Bretz	<ul style="list-style-type: none"> • MCKPUB00004461 • MCKPUB00004462 • MCKPUB00004464 • OBN_MDL 1st Production 122353

	Name	Sources
		<ul style="list-style-type: none"> • OBN_MDL 1st Production 161507
57.	Michael Robert Briggs	<ul style="list-style-type: none"> • MCKPUB00004539 • OBN_MDL 1st Production 098951
58.	Amanda Brittain	<ul style="list-style-type: none"> • OBN_MDL 1st Production 038993
59.	Dennis M. Brody	<ul style="list-style-type: none"> • MCKPUB00028954 • OBN_MDL 1st Production 010874
60.	Ronald Brooks	<ul style="list-style-type: none"> • CUYAH_000047522 • MCKPUB00005325 • MCKPUB00005326 • MCKPUB00005329
61.	Jassmen M. Brown	<ul style="list-style-type: none"> • CLEVE_004084859 • MCKPUB00024722 • MCKPUB00024724 • MCKPUB00024729
62.	Rudius Brown	<ul style="list-style-type: none"> • CUYAH_000047280 • MCKPUB00005388 • MCKPUB00005390 • MCKPUB00005393
63.	Christopher Lee Bruender	<ul style="list-style-type: none"> • OBN_MDL 1st Production 080783 • OBN_MDL 1st Production 085996 • MCKPUB00001933
64.	Obie Bryant III	<ul style="list-style-type: none"> • CUYAH_000066532 • MCKPUB00004869 • MCKPUB00004870 • MCKPUB00004873

	Name	Sources
65.	Kristin E. Bucce	<ul style="list-style-type: none"> • OBN_MDL 1st Production 140843 • MCKPUB00003722
66.	Charles E. Bullard Jr.	<ul style="list-style-type: none"> • CUYAH_000075379 • MCKPUB00001849 • MCKPUB00001850 • MCKPUB00001855
67.	Kathleen A. Burgan	<ul style="list-style-type: none"> • CLEVE_004083991 • MCKPUB00024731 • MCKPUB00024733 • MCKPUB00024736
68.	Judy Burrows	<ul style="list-style-type: none"> • MCKPUB00003287 • MCKPUB00003290
69.	David Adam Butler	<ul style="list-style-type: none"> • OBN_MDL 1st Production 025249 • OBN_MDL 1st Production 025254 • OBN_MDL 1st Production 025268 • MCKPUB00002231
70.	Andrew Byrd	<ul style="list-style-type: none"> • CUYAH_000049377 • MCKPUB00001120 • MCKPUB00001121 • MCKPUB00001124
71.	James Byrge	<ul style="list-style-type: none"> • MCKPUB00002871 • MCKPUB00002874
72.	Brandon Lovell Campbell	<ul style="list-style-type: none"> • AKRON_001282517 • MCKPUB00024743 • MCKPUB00024744 • MCKPUB00024747
73.	Robert Campbell	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00005274 • MCKPUB00005276 • MCKPUB00005284

	Name	Sources
74.	Mark Lee Cantrell Jr.	<ul style="list-style-type: none"> • OBN_MDL 1st Production 107561 • MCKPUB00028962
75.	Nancy Capiccioli	<ul style="list-style-type: none"> • OBN_MDL 1st Production 059516 • MCKPUB00004731
76.	Sabrina Carr	<ul style="list-style-type: none"> • CUYAH_000028937 • MCKPUB00005431 • MCKPUB00005432 • MCKPUB00005435
77.	Carol Carter	<ul style="list-style-type: none"> • CUYAH_000040415 • MCKPUB00001769 • MCKPUB00001770 • MCKPUB00001773
78.	Tammie Cartwright	<ul style="list-style-type: none"> • CUYAH_014631107 • CUYAH_014631148 • MCKPUB00024482 • MCKPUB00024483 • MCKPUB00024486
79.	Stephanie Ann Cestnik	<ul style="list-style-type: none"> • MCKPUB00005740 • OBN_MDL 1st Production 102044
80.	Roland Chambers	<ul style="list-style-type: none"> • CUYAH_000036417 • MCKPUB00005309 • MCKPUB00005310 • MCKPUB00005313
81.	Jennifer S. Chan	<ul style="list-style-type: none"> • CUYAH_014631381 • MCKPUB00024428 • MCKPUB00024429 • MCKPUB00024432
82.	Kevin M. Chanowski	<ul style="list-style-type: none"> • MCKPUB00003640 • MCKPUB00003641 • OBN_MDL 1st Production 132477

	Name	Sources
83.	Samuel Clanton	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00005450 • MCKPUB00005452 • MCKPUB00005455
84.	Brandi R. Clark	<ul style="list-style-type: none"> • AKRON_001158017 • MCKPUB00024749 • MCKPUB00024750 • MCKPUB00024752
85.	Chad E. Cloer	<ul style="list-style-type: none"> • AKRON_001126245 • MCKPUB00024754 • MCKPUB00024755 • MCKPUB00024757
86.	Lashar Camila Clay	<ul style="list-style-type: none"> • OBN_MDL 1st Production 098951 • OBN_MDL 1st Production 102044 • MCKPUB00003793
87.	Sandra Colegrove	<ul style="list-style-type: none"> • CUYAH_000041260 • MCKPUB00005457 • MCKPUB00005458 • MCKPUB00005461
88.	Rebecca Jo Collen	<ul style="list-style-type: none"> • MCKPUB00005188 • OBN_MDL 1st Production 074923
89.	Jennifer Marie Collins	<ul style="list-style-type: none"> • MCKPUB00003133 • OBN_MDL 1st Production 059516
90.	Johnnie Mae Collins	<ul style="list-style-type: none"> • AKRON_001222775 • MCKPUB00024759 • MCKPUB00024760 • MCKPUB00024762
91.	Luis Colon	<ul style="list-style-type: none"> • CUYAH_000045217 • MCKPUB00004162 • MCKPUB00004163 • MCKPUB00004166

	Name	Sources
92.	Anthony Congeni	<ul style="list-style-type: none"> • CUYAH_000027537 • CUYAH_000032999 • MCKPUB00001283 • MCKPUB00001285 • MCKPUB00001288 • MCKPUB00001290 • MCKPUB00001291 • MCKPUB00001293
93.	James D. Conley	<ul style="list-style-type: none"> • AKRON_000290826 • MCKPUB00002876 • MCKPUB00002878
94.	Michael Connally	<ul style="list-style-type: none"> • MCKPUB00018716 • MCKPUB00018717 • MCKPUB00018722
95.	Lateris A. Cook	<ul style="list-style-type: none"> • AKRON_001237601 • MCKPUB00024765 • MCKPUB00024767 • MCKPUB00024768
96.	Theodore Cook	<ul style="list-style-type: none"> • CUYAH_000039385 • MCKPUB00005918 • MCKPUB00005920 • MCKPUB00005923
97.	Tevin Copes	<ul style="list-style-type: none"> • CUYAH_000071879 • MCKPUB00005911 • MCKPUB00005914 • MCKPUB00005915
98.	Chad Covey	<ul style="list-style-type: none"> • CUYAH_000038461 • MCKPUB00001840 • MCKPUB00001841 • MCKPUB00001846
99.	Kristina L. Cox	<ul style="list-style-type: none"> • MCKPUB00003740

	Name	Sources
100.	Myron M. Crowder	<ul style="list-style-type: none"> • CUYAH_000035231 • MCKPUB00004716 • MCKPUB00004718 • MCKPUB00004722
101.	Angela Crum	<ul style="list-style-type: none"> • CUYAH_000039144 • MCKPUB00001133 • MCKPUB00001134 • MCKPUB00001136
102.	Terrence L. Crumby	<ul style="list-style-type: none"> • AKRON_001157890 • MCKPUB00024769 • MCKPUB00024770 • MCKPUB00024773
103.	Laura Ruth Cupple	<ul style="list-style-type: none"> • MCKPUB00003863 • OBN_MDL 1st Production 001828
104.	Susan Renee Dalessandro	<ul style="list-style-type: none"> • CLEVE_004084491 • MCKPUB00005866 • OBN_MDL 1st Production 085996
105.	Lisa Marie Darus	<ul style="list-style-type: none"> • MCKPUB00004074 • OBN_MDL 1st Production 083864
106.	Morgan E. Dasilva	<ul style="list-style-type: none"> • MCKPUB00004696 • OBN_MDL 1st Production 014736 • OBN_MDL 1st Production 023282
107.	Ashley Rebecca Davis	<ul style="list-style-type: none"> • MCKPUB00001417
108.	Dorothy R. Davis	<ul style="list-style-type: none"> • OBN_MDL 1st Production 000001

	Name	Sources
109.	Elizabeth Davis	<ul style="list-style-type: none"> • MCKPUB00002591 • MCKPUB00002600
110.	Francisco Davis	<ul style="list-style-type: none"> • CUYAH_000080300 • MCKPUB00002653 • MCKPUB00002654 • MCKPUB00002657
111.	Lauren Marie Davis-Tissue	<ul style="list-style-type: none"> • MCKPUB00003886 • OBN_MDL 1st Production 074923 • OBN_MDL 1st Production 154020
112.	Susan Desimone	<ul style="list-style-type: none"> • OBN_MDL 1st Production 125822
113.	Lamar Dixon	<ul style="list-style-type: none"> • CUYAH_000029718 • MCKPUB00003784 • MCKPUB00003785 • MCKPUB00003790
114.	Audrey Marie Domzalski	<ul style="list-style-type: none"> • OBN_MDL 1st Production 059516 • MCKPUB00001485
115.	Jose Dones	<ul style="list-style-type: none"> • CUYAH_000072439 • MCKPUB00003266 • MCKPUB00003267 • MCKPUB00003270
116.	Tiffany L. Dosztal	<ul style="list-style-type: none"> • OBN_MDL 1st Production 031252 • MCKPUB00006015 • MCKPUB00006016 • MCKPUB00006019
117.	Ashley Elizabeth Doyle	<ul style="list-style-type: none"> • MCKPUB00001359

	Name	Sources
118.	Gregory Dresko	<ul style="list-style-type: none"> • CUYAH_000045174 • MCKPUB00002756 • MCKPUB00002758 • MCKPUB00002762
119.	Grace Genevieve Drouhard	<ul style="list-style-type: none"> • MCKPUB00002734 • OBN_MDL 1st Production 085996 • OBN_MDL 1st Production 107561 • OBN_MDL 1st Production 152407
120.	Dawn Marie Dupont	<ul style="list-style-type: none"> • MCKPUB00002307
121.	Crystal M. Dyer	<ul style="list-style-type: none"> • AKRON_001227274 • MCKPUB00024776 • MCKPUB00024777 • MCKPUB00024779
122.	Thomas Eckel	<ul style="list-style-type: none"> • AKRON_001312626 • AKRON_001312627 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
123.	Troy Edgehouse	<ul style="list-style-type: none"> • AKRON_001247770 • AKRON_001247771 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
124.	Suzanne Lee Edwards	<ul style="list-style-type: none"> • MCKPUB00005879 • OBN_MDL 1st Production 023282
125.	Lindsay Marie Eichenberger	<ul style="list-style-type: none"> • MCKPUB00003976 • OBN_MDL 1st Production 11399

	Name	Sources
126.	Amon Elliott	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00001064 • MCKPUB00001065 • MCKPUB00001068
127.	Daniel P. Ellis	<ul style="list-style-type: none"> • MCKPUB00024781 • MCKPUB00024784 • MCKPUB00024785 • MCKPUB00024787 • SUMMIT_000519619
128.	Amy C. Eloshway	<ul style="list-style-type: none"> • OBN_MDL 1st Production 003315
129.	Louis Eppinger	<ul style="list-style-type: none"> • MCKPUB00004152 • MCKPUB00004155
130.	Asmar J. Epps	<ul style="list-style-type: none"> • AKRON_001275171 • MCKPUB00024790 • MCKPUB00024791 • MCKPUB00024793
131.	Melissa Ermacora	<ul style="list-style-type: none"> • CUYAH_000045106 • MCKPUB00004393 • OBN_MDL 1st Production 029049
132.	Ashley Evans	<ul style="list-style-type: none"> • AKRON_001150411 • AKRON_001278322 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
133.	Tina Evans	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00006043 • MCKPUB00006044 • MCKPUB00006046

	Name	Sources
134.	Tiauna C. Farrow	<ul style="list-style-type: none"> • CUYAH_000032131 • MCKPUB00006007 • MCKPUB00006008 • MCKPUB00006012
135.	Darrin Fears	<ul style="list-style-type: none"> • CUYAH_000071356 • MCKPUB00002222 • MCKPUB00002223 • MCKPUB00002228
136.	Christopher E. Feiteira	<ul style="list-style-type: none"> • MCKPUB00024797 • MCKPUB00024800 • MCKPUB00024801 • MCKPUB00024804 • SUMMIT_000519619
137.	Rachael J. Figuly	<ul style="list-style-type: none"> • CUYAH_000045099 • MCKPUB00005053 • OBN_MDL 1st Production 083864
138.	Morgan Elizabeth Fitzmaurice	<ul style="list-style-type: none"> • CUYAH_000039060 • MCKPUB00004676
139.	Michael J. Folczynski	<ul style="list-style-type: none"> • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 150318
140.	Pamela Ford	<ul style="list-style-type: none"> • OBN_MDL 1st Production 025450 • OBN_MDL 1st Production 025457 • MCKPUB00004897
141.	Tammy S. Forrest	<ul style="list-style-type: none"> • OBN_MDL 1st Production 001828 • OBN_MDL 1st Production 155386
142.	Antwane L. Foster	<ul style="list-style-type: none"> • AKRON_001280360 • MCKPUB00024835 • MCKPUB00024836 • MCKPUB00024839

	Name	Sources
143.	Nyeisha Foster	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00004864 • MCKPUB00004865 • MCKPUB00004867
144.	Thomas Lee Fowkes	<ul style="list-style-type: none"> • MCKPUB00005981 • OBN_MDL 1st Production 010874
145.	Martha Jane Fries	<ul style="list-style-type: none"> • MCKPUB00004226 • OBN_MDL 1st Production 110764
146.	Sonja Fulton	<ul style="list-style-type: none"> • MCKPUB00005595
147.	Naisha C. Gardner	<ul style="list-style-type: none"> • CUYAH_000032131 • MCKPUB00004724 • MCKPUB00004725 • MCKPUB00004728
148.	Carmine J. Gargano	<ul style="list-style-type: none"> • CUYAH_000043892 • MCKPUB00001763 • MCKPUB00001764 • MCKPUB00001767
149.	John A. Gibson Jr.	<ul style="list-style-type: none"> • AKRON_001157614 • MCKPUB00024842 • MCKPUB00024843 • MCKPUB00024845
150.	Debra D. Gill	<ul style="list-style-type: none"> • MCKPUB00002342 • OBN_MDL 1st Production 021117
151.	Gurkiran (Karen) Gill	<ul style="list-style-type: none"> • MCKPUB00002765 • OBN_MDL 1st Production 025481 • OBN_MDL 1st Production 025489

	Name	Sources
152.	Faith Elaine Gingerich	<ul style="list-style-type: none"> • MCKPUB00002630 • OBN_MDL 1st Production 107561 • OBN_MDL 1st Production 156827
153.	Brittany N. Glass	<ul style="list-style-type: none"> • MCKPUB00001604 • MCKPUB00001607
154.	Christopher Glatzer	<ul style="list-style-type: none"> • MCKPUB00008973 • MCKPUB00008975 • MCKPUB00008977
155.	Mark Glockner	<ul style="list-style-type: none"> • CUYAH_000039867 • MCKPUB00004216 • MCKPUB00004217 • MCKPUB00004219
156.	Margaret Mariam Goetz	<ul style="list-style-type: none"> • OBN_MDL 1st Production 132477 • OBN_MDL 1st Production 152729
157.	Kandi Renee Gold	<ul style="list-style-type: none"> • OBN_MDL 1st Production 072083 • MCKPUB00003314
158.	Kristy Jean Goldrick	<ul style="list-style-type: none"> • BN_MDL 1st Production 107561 • MCKPUB00003679
159.	Richard A. Gomez	<ul style="list-style-type: none"> • MCKPUB00024849 • MCKPUB00024852 • MCKPUB00024853 • MCKPUB00024855 • SUMMIT_000519619
160.	Franklin Goodrich	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00002666 • MCKPUB00002668 • MCKPUB00002671

	Name	Sources
161.	Elizabeth Ann Grabiec	<ul style="list-style-type: none"> • MCKPUB00002602 • OBN_MDL 1st Production 033744
162.	Michael D. Grant II	<ul style="list-style-type: none"> • CUYAH_000057784 • MCKPUB00004512 • MCKPUB00004513 • MCKPUB00004516
163.	David Graybill	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00002270 • MCKPUB00002272 • MCKPUB00002275
164.	Amanda C. Greene	<ul style="list-style-type: none"> • MCKPUB00000952 • MCKPUB00000954 • MCKPUB00000957 • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 155070
165.	Ashley Marie Greene	<ul style="list-style-type: none"> • MCKPUB00001375
166.	Amanda Griss	<ul style="list-style-type: none"> • MCKPUB00000959 • OBN_MDL 1st Production 026476
167.	Jennifer A. Grubb	<ul style="list-style-type: none"> • AKRON_001276829 • MCKPUB00024859 • MCKPUB00024860 • MCKPUB00024862
168.	Anmarie Gum	<ul style="list-style-type: none"> • MCKPUB00001155 • OBN_MDL 1st Production 043086 • OBN_MDL 1st Production 054509 • OBN_MDL 1st Production 077501
169.	Nicole M. Guzman	<ul style="list-style-type: none"> • OBN_MDL 1st Production 132477 • OBN_MDL 1st Production 138020

	Name	Sources
170.	Robert A. Halabica	<ul style="list-style-type: none"> • CUYAH_000023705 • MCKPUB00005269 • MCKPUB00005270 • MCKPUB00005272
171.	Aaron Hall	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00000905 • MCKPUB00000906 • MCKPUB00000908
172.	Peggy Lynn Hamilton	<ul style="list-style-type: none"> • MCKPUB00005004 • MCKPUB00005005 • MCKPUB00005008 • OBN_MDL 1st Production 129446
173.	William Luther Hamilton	<ul style="list-style-type: none"> • MCKPUB00006190 • OBN_MDL 1st Production 026480 • OBN_MDL 1st Production 031252
174.	Jamie L. Hammonds	<ul style="list-style-type: none"> • AKRON_000216740 • MCKPUB00002947 • MCKPUB00002950
175.	Tina Marie Hanish	<ul style="list-style-type: none"> • MCKPUB00006048 • OBN_MDL 1st Production 107561
176.	Adria Harper	<ul style="list-style-type: none"> • MCKPUB0000910 • MCKPUB00004923 • MCKPUB00024864 • MCKPUB00024939
177.	David A. Harris Jr.	<ul style="list-style-type: none"> • AKRON_001157676 • MCKPUB00025014 • MCKPUB00025015 • MCKPUB00025017
178.	Lavelle Harris	<ul style="list-style-type: none"> • CUYAH_000051471 • MCKPUB00003922 • MCKPUB00003923 • MCKPUB00003925

	Name	Sources
179.	Monique Harris	<ul style="list-style-type: none"> • MCKPUB00004634 • MCKPUB00004636 • MCKPUB00004640 • MCKPUB00004642 • OBNMDL 1st Production 095701 • OBN_MDL 1st Production 110764
180.	Angela L. Harrison	<ul style="list-style-type: none"> • CUYAH_000036140 • MCKPUB00001144 • MCKPUB00001145 • MCKPUB00001148
181.	Sheila S. Harvey	<ul style="list-style-type: none"> • CUYAH_000047522 • MCKPUB00005537 • MCKPUB00005538 • MCKPUB00005541
182.	Mary A. Havran	<ul style="list-style-type: none"> • MCKPUB00004241 • OBN_MDL 1st Production 003315 • OBN_MDL 1st Production 033744
183.	Cynthia S. Hawkins	<ul style="list-style-type: none"> • OBN_MDL 1st Production 000001
184.	Karen L. Hawkins	<ul style="list-style-type: none"> • OBN_MDL 1st Production 016725
185.	Christina Elizabeth Haynes	<ul style="list-style-type: none"> • MCKPUB00001902 • OBN_MDL 1st Production 074923 • OBN_MDL 1st Production 154020
186.	Timothy J. Haywood	<ul style="list-style-type: none"> • CUYAH_000053407 • CUYAH_000053812 • MCKPUB00006036 • MCKPUB00006038 • MCKPUB00006041

	Name	Sources
187.	Maureen Shannon Henry	<ul style="list-style-type: none"> • MCKPUB00004316 • OBN_MDL 1st Production 010874
188.	Nicholas Hershbach	<ul style="list-style-type: none"> • CUYAH_000036937 • MCKPUB00019051 • MCKPUB00019052 • MCKPUB00019056
189.	Lisa Ann Hickin	<ul style="list-style-type: none"> • MCKPUB00004024 • OBN_MDL 1st Production 085996
190.	Daniel C. Higgins	<ul style="list-style-type: none"> • MCKPUB00002101 • OBN_MDL 1st Production 021117
191.	Thomas S. Hilbert	<ul style="list-style-type: none"> • MCKPUB00005944 • MCKPUB00005945 • MCKPUB00005947 • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 150318
192.	Michael W. Hilditch	<ul style="list-style-type: none"> • AKRON_001286931 • MCKPUB00025019 • MCKPUB00025020 • MCKPUB00025023
193.	Howard H. Hills Jr.	<ul style="list-style-type: none"> • AKRON_001157119 • MCKPUB00025025 • MCKPUB00025026 • MCKPUB00025028
194.	Sean Christopher Hinkle	<ul style="list-style-type: none"> • MCKPUB00005473 • MCKPUB00005474 • MCKPUB00005477 • OBN_MDL 1st Production 056992
195.	Rosemary Anne Hite	<ul style="list-style-type: none"> • MCKPUB00005363 • MCKPUB00005365 • MCKPUB00005369 • MCKPUB00005371

	Name	Sources
		<ul style="list-style-type: none"> • OBN_MDL 1st Production 010874
196.	Angela Holcepl	<ul style="list-style-type: none"> • CUYAH_000035541 • MCKPUB00001138 • MCKPUB00001139 • MCKPUB00001142
197.	Tara Marie Holodnak	<ul style="list-style-type: none"> • MCKPUB00005892 • OBN_MDL 1st Production 003315
198.	Wayne Holt	<ul style="list-style-type: none"> • CUYAH_000026442 • MCKPUB00006178 • MCKPUB00006180 • MCKPUB00006183
199.	Morrissa Hooker	<ul style="list-style-type: none"> • AKRON_001218850 • MCKPUB00025030 • MCKPUB00025031 • MCKPUB00025034
200.	Jesse L. Ho Jr.	<ul style="list-style-type: none"> • CUYAH_000038383 • MCKPUB00003187 • MCKPUB00003189 • MCKPUB00003194
201.	Gayle Ellen Houdek	<ul style="list-style-type: none"> • MCKPUB00002689 • OBN_MDL 1st Production 11399
202.	Molly Sue Howard	<ul style="list-style-type: none"> • MCKPUB00004602 • OBN_MDL 1st Production 098951
203.	Amy Heather Hudson	<ul style="list-style-type: none"> • MCKPUB00001071 • OBN_MDL 1st Production 107561

	Name	Sources
204.	James Hudson-Bey	<ul style="list-style-type: none"> • CUYAH_000032131 • MCKPUB00002879 • MCKPUB00002880 • MCKPUB00002885
205.	Crystal Lynn Huffman	<ul style="list-style-type: none"> • OBN_MDL 1st Production 069491
206.	Shawn W. Hughes	<ul style="list-style-type: none"> • CUYAH_000047665 • MCKPUB00005531 • MCKPUB00005532 • MCKPUB00005535
207.	Theresa Impala	<ul style="list-style-type: none"> • CUYAH_000050322 • MCKPUB00005925
208.	Anthony Jackson	<ul style="list-style-type: none"> • CUYAH_000034367 • MCKPUB00001299 • MCKPUB00001300 • MCKPUB00001302
209.	Gail Jackson	<ul style="list-style-type: none"> • CUYAH_000026442 • MCKPUB00002673 • MCKPUB00002674 • MCKPUB00002679
210.	Russell R. James	<ul style="list-style-type: none"> • CUYAH_000038775 • CUYAH_000039842 • MCKPUB00005403 • MCKPUB00005405 • MCKPUB00005408 • MCKPUB00005395 • MCKPUB00005397 • MCKPUB00005400
211.	Thomas J. Janecko	<ul style="list-style-type: none"> • MCKPUB00005949 • OBN_MDL 1st Production 010874 • OBN_MDL 1st Production 023282

	Name	Sources
212.	Alice V. Johnson	<ul style="list-style-type: none"> • CUYAH_000048938 • MCKPUB00000913 • MCKPUB00000914 • MCKPUB00000917
213.	Jaime Lyn Johnson	<ul style="list-style-type: none"> • MCKPUB00002951 • OBN_MDL 1st Production 059516
214.	Perry Johnson	<ul style="list-style-type: none"> • MCKPUB00005010 • MCKPUB00005017 • MCKPUB00005019 • MCKPUB00005025 • MCKPUB00005031 • MCKPUB00005032 • MCKPUB00005040 • MCKPUB00005042
215.	Vince R. Johnson Jr.	<ul style="list-style-type: none"> • AKRON_001208468 • SUMMIT_000407368 • Summit County and City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants' Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19
216.	Donte Jones	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00002493 • MCKPUB00002495 • MCKPUB00002499 • MCKPUB00002501 • MCKPUB00002502 • MCKPUB00002504

	Name	Sources
217.	Jason Robert Jones	<ul style="list-style-type: none"> • MCKPUB00003012 • OBN_MDL 1st Production 010874
218.	Robert Jones	<ul style="list-style-type: none"> • CUYAH_000038620 • MCKPUB00005286 • MCKPUB00005287 • MCKPUB00005289
219.	Krystyna L. Kaiser	<ul style="list-style-type: none"> • CUYAH_000032131 • MCKPUB00003779 • MCKPUB00003780 • MCKPUB00003782
220.	Heather Kaput	<ul style="list-style-type: none"> • MCKPUB00024226 • MCKPUB00024229 • MCKPUB00024230 • MCKPUB00024233
221.	Frank J. Kasmerski	<ul style="list-style-type: none"> • CUYAH_000043892 • MCKPUB00002659 • MCKPUB00002660 • MCKPUB00002663
222.	Jacob Jason Keaton	<ul style="list-style-type: none"> • MCKPUB00002862 • OBN_MDL 1st Production 110764
223.	Melinda Louise Keirsey	<ul style="list-style-type: none"> • MCKPUB00004384 • MCKPUB00004385 • MCKPUB00004390 • OBN_MDL 1st Production 056992 • OBN_MDL 1st Production 151566
224.	David Kelly	<ul style="list-style-type: none"> • CUYAH_000024067 • MCKPUB00002286 • MCKPUB00002287 • MCKPUB00002289
225.	Zachary Kennedy	<ul style="list-style-type: none"> • CUYAH_000032325 • MCKPUB00003611 • MCKPUB00003612

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00003614
226.	Gary Keslar	<ul style="list-style-type: none"> • CUYAH_000037516 • MCKPUB00002682 • MCKPUB00002683 • MCKPUB00002686
227.	Brian Kins	<ul style="list-style-type: none"> • CUYAH_000048583 • MCKPUB00001591 • MCKPUB00001593 • MCKPUB00001596
228.	Cecilia C. Kinsinger	<ul style="list-style-type: none"> • AKRON_001157371 • SUMMIT_000367169 • SUMMIT_000368090 • MCKPUB00025044 • MCKPUB00025045 • MCKPUB00025047 • MCKPUB00025050 • MCKPUB00025051 • MCKPUB00025054 • MCKPUB00025057 • MCKPUB00025058 • MCKPUB00025060
229.	Stacey M. Markelonis Kiscoe	<ul style="list-style-type: none"> • MCKPUB00005675 • OBN_MDL 1st Production 035469
230.	Heather Knepper	<ul style="list-style-type: none"> • OBN_MDL 1st Production 038993
231.	Angelique M. Kolcun	<ul style="list-style-type: none"> • OBN_MDL 1st Production 129446 • OBN_MDL 1st Production 152729

	Name	Sources
232.	Donald Kopp	<ul style="list-style-type: none"> • CUYAH_000032722 • MCKPUB00002457 • MCKPUB00002458 • MCKPUB00002461
233.	Mary Korybko	<ul style="list-style-type: none"> • CUYAH_000038503 • MCKPUB00004287 • MCKPUB00004288 • MCKPUB00004291
234.	Renee Kovach	<ul style="list-style-type: none"> • CUYAH_000035773 • MCKPUB00005250 • MCKPUB00005251 • MCKPUB00005255
235.	Christopher M. Koviak	<ul style="list-style-type: none"> • OBN_MDL 1st Production 083864
236.	Nicholas Kozanas	<ul style="list-style-type: none"> • CUYAH_000032867 • MCKPUB00004787 • MCKPUB00004788 • MCKPUB00004791
237.	Christopher Kraus	<ul style="list-style-type: none"> • CUYAH_000034282 • MCKPUB00001926 • MCKPUB00001927 • MCKPUB00001930
238.	Kelly Anne Krueger	<ul style="list-style-type: none"> • MCKPUB00003616 • MCKPUB00003618 • MCKPUB00003620 • MCKPUB00023809 • OBN_MDL 1st Production 033744
239.	Troy David Kubincanek	<ul style="list-style-type: none"> • MCKPUB00006080 • OBN_MDL 1st Production 074923 • OBN_MDL 1st Production 160964
240.	Kourtney N. Kubicina	<ul style="list-style-type: none"> • OBN_MDL 1st Production 132477

	Name	Sources
241.	Majed Lababidi	<ul style="list-style-type: none"> • CUYAH_000035754 • MCKPUB00004176 • MCKPUB00004177 • MCKPUB00004182
242.	Patricia Sue Lahm	<ul style="list-style-type: none"> • OBN_MDL 1st Production 016725
243.	Patricia Laughman	<ul style="list-style-type: none"> • MCKPUB00004921 • MCKPUB00004923 • Summit County & City of Akron, Ohio Plaintiff First Amended Responses and Objections to Distributor Defendants' First Set of Interrogatories • Summit County, Corrected Second Amended Complaint
244.	Brian J. Lawrence	<ul style="list-style-type: none"> • CUYAH_000021940 • MCKPUB00001586 • MCKPUB00001587 • MCKPUB00001589
245.	Matthew Lawson	<ul style="list-style-type: none"> • CUYAH_000040016 • MCKPUB00004293 • MCKPUB00004294 • MCKPUB00004296
246.	Christine Anne Leatherman	<ul style="list-style-type: none"> • OBN_MDL 1st Production 001828 • OBN_MDL 1st Production 150987
247.	Karla R. Lebreton	<ul style="list-style-type: none"> • MCKPUB00003420
248.	Jordan Levy	<ul style="list-style-type: none"> • CUYAH_000034119 • MCKPUB00003261 • MCKPUB00003262 • MCKPUB00003264

	Name	Sources
249.	Brooke Lewis	<ul style="list-style-type: none"> • CUYAH_000035737 • MCKPUB00001616 • MCKPUB00001617 • MCKPUB00001622
250.	Jeffrey Light	<ul style="list-style-type: none"> • AKRON_001312644 • MCKPUB00025068 • MCKPUB00025069 • MCKPUB00025072
251.	Cassandra T. Linden	<ul style="list-style-type: none"> • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 159202
252.	Alexander Linton	<ul style="list-style-type: none"> • AKRON_000337173 • AKRON_000337174 • MCKPUB00025075 • MCKPUB00025076 • MCKPUB00025078 • MCKPUB00025079 • MCKPUB00025081 • MCKPUB00025082 • MCKPUB00025084 • MCKPUB00025086 • MCKPUB00025088 • Summit County and City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants' Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19

	Name	Sources
253.	Kimberly Marie Lockhart	<ul style="list-style-type: none"> • MCKPUB00003654 • OBN_MDL 1st Production 102044
254.	Jason A. Loftus	<ul style="list-style-type: none"> • MCKPUB00025090 • MCKPUB00025093 • MCKPUB00025094 • MCKPUB00025096 • SUMMIT_000519619
255.	Susan Lynn Longoria	<ul style="list-style-type: none"> • MCKPUB00005826 • OBN_MDL 1st Production 033744
256.	Anthony Loperto	<ul style="list-style-type: none"> • CUYAH_000049363 • MCKPUB00001304 • MCKPUB00001305 • MCKPUB00001308
257.	Senolia Love	<ul style="list-style-type: none"> • CUYAH_000048107 • MCKPUB00005480 • MCKPUB00005481 • MCKPUB00005486
258.	Devon L. Lovejoy	<ul style="list-style-type: none"> • MCKPUB00002439 • OBN_MDL 1st Production 098951
259.	Jerrad Lunsford	<ul style="list-style-type: none"> • CUYAH_000045217 • MCKPUB00003180 • MCKPUB00003181 • MCKPUB00003184
260.	Michael M. Lynard	<ul style="list-style-type: none"> • CUYAH_000028522 • MCKPUB00004527 • MCKPUB00004528 • MCKPUB00004531
261.	Daniel Macalonan	<ul style="list-style-type: none"> • CUYAH_000040722 • MCKPUB00002118 • MCKPUB00002119 • MCKPUB00002122

	Name	Sources
262.	Sandra Malave	<ul style="list-style-type: none"> • CUYAH_000079024 • MCKPUB00005463 • MCKPUB00005464 • MCKPUB00005466
263.	Andy Maldonado	<ul style="list-style-type: none"> • CUYAH_000034215 • MCKPUB00001126 • MCKPUB00001127 • MCKPUB00001130
264.	Michael J. Malys III	<ul style="list-style-type: none"> • MCKPUB00004533 • MCKPUB00004535 • MCKPUB00004537 • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 159202
265.	Monica Lee Mandich	<ul style="list-style-type: none"> • MCKPUB00004615 • OBN_MDL 1st Production 098951
266.	Matthew Michael Marasch	<ul style="list-style-type: none"> • OBN_MDL 1st Production 031252 • MCKPUB00004298
267.	Carreese L. Martin	<ul style="list-style-type: none"> • MCKPUB00001726 • OBN_MDL 1st Production 098951
268.	Rejina Lynn Martin	<ul style="list-style-type: none"> • AKRON_001273406 • MCKPUB00025098 • MCKPUB00025099 • MCKPUB00025101
269.	Catherine Martz	<ul style="list-style-type: none"> • CUYAH_000030641 • MCKPUB00001820
270.	Karen Lynn Massey	<ul style="list-style-type: none"> • MCKPUB00003354 • MCKPUB00003372 • MCKPUB00003390 • OBN_MDL 1st Production 012869

	Name	Sources
271.	Georgia Ann Matos	<ul style="list-style-type: none"> • MCKPUB00002711 • MCKPUB00002712 • MCKPUB00002714 • MCKPUB00028988 • OBN_MDL 1st Production 014736
272.	Lisa J. McAvinew	<ul style="list-style-type: none"> • MCKPUB00004045 • OBN_MDL 1st Production 035469
273.	Denise Annette McCanna	<ul style="list-style-type: none"> • MCKPUB00002382 • OBN_MDL 1st Production 023282 • OBN_MDL 1st Production 029049
274.	Darrian McCarroll	<ul style="list-style-type: none"> • CUYAH_000043206 • MCKPUB00002215 • MCKPUB00002217 • MCKPUB00002220
275.	Alvin McCurdy	<ul style="list-style-type: none"> • MCKPUB00000945 • MCKPUB00000948 • MCKPUB00000949
276.	Ryan L. McManus	<ul style="list-style-type: none"> • CUYAH_000038627 • MCKPUB00005417 • MCKPUB00005419 • MCKPUB00005422
277.	Shannon Davis McNamara	<ul style="list-style-type: none"> • MCKPUB00023924 • OBN_MDL 1st Production 102044
278.	Donald McNea	<ul style="list-style-type: none"> • CUYAH_000020924 • MCKPUB00002463 • MCKPUB00002464 • MCKPUB00002466
279.	Ronald G. Mainor	<ul style="list-style-type: none"> • CUYAH_000042658 • MCKPUB00005335 • MCKPUB00005336 • MCKPUB00005341

	Name	Sources
280.	Debra S. Medovic	<ul style="list-style-type: none"> • CUYAH_000024898 • MCKPUB00002366 • MCKPUB00002367 • MCKPUB00002372
281.	Javonnda M. Merchant	<ul style="list-style-type: none"> • OBN_MDL 1st Production 064580
282.	Holly Marie Metz	<ul style="list-style-type: none"> • MCKPUB00002839
283.	Joseph Michael	<ul style="list-style-type: none"> • AKRON_001312637 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
284.	Sabrina Mickel	<ul style="list-style-type: none"> • CUYAH_000075738 • MCKPUB00005444 • MCKPUB00005446 • MCKPUB00005448 • MCKPUB00024552 • MCKPUB00024555 • OSDB_MDL 1st Production _007517
285.	Christopher Mihalek	<ul style="list-style-type: none"> • MCKPUB00024114 • MCKPUB00024121 • MCKPUB00024122 • MCKPUB00024127 • MCKPUB00024129
286.	Paul D. Millay	<ul style="list-style-type: none"> • CUYAH_000041123 • MCKPUB00004937 • MCKPUB00004938 • MCKPUB00004941
287.	Christine Elizabeth Miller	<ul style="list-style-type: none"> • OBN_MDL 1st Production 021117 • MCKPUB00023758

	Name	Sources
288.	Derrick V. Miller Jr.	<ul style="list-style-type: none"> • CUYAH_000032131 • MCKPUB00002412 • MCKPUB00002413 • MCKPUB00002415
289.	Kenneth Mills	<ul style="list-style-type: none"> • MCKPUB00024454 • MCKPUB00024455 • MCKPUB00024457
290.	Monica R. Mills	<ul style="list-style-type: none"> • MCKPUB00004631 • MCKPUB00004633 • OBN_MDL 1st Production 125822 • OBN_MDL 1st Production 132477
291.	Christa Marie Mistak	<ul style="list-style-type: none"> • MCKPUB00001881 • OBN_MDL 1st Production 021117 • OBN_MDL 1st Production 155623
292.	Heather R. Mitchell	<ul style="list-style-type: none"> • MCKPUB00024322 • MCKPUB00024333 • MCKPUB00024334 • MCKPUB00024339 • MCKPUB00024341
293.	Linda Jeanne Moore	<ul style="list-style-type: none"> • OBN_MDL 1st Production 054509
294.	Jennifer L. Moran	<ul style="list-style-type: none"> • MCKPUB00003086 • OBN_MDL 1st Production 085996
295.	James Joseph Morris	<ul style="list-style-type: none"> • MCKPUB00002888 • OBN_MDL 1st Production 085996
296.	Dustin Myers	<ul style="list-style-type: none"> • CUYAH_000023705 • MCKPUB00002508 • MCKPUB00002509 • MCKPUB00002511

	Name	Sources
297.	Jonell Alethea Neiswonger	<ul style="list-style-type: none"> • OBN_MDL 1st Production 069491 • OBN_MDL 1st Production 160588
298.	Mary Neuman	<ul style="list-style-type: none"> • CUYAH_000028065
299.	Megan M. Neuman	<ul style="list-style-type: none"> • MCKPUB00004354 • MCKPUB00029001 • OBN_MDL 1st Production 056992 • OBN_MDL 1st Production 160421
300.	Helga Janine Nicastro	<ul style="list-style-type: none"> • MCKPUB00002820 • OBN_MDL 1st Production 033744 • OBN_MDL 1st Production 155812
301.	Annette Nigro	<ul style="list-style-type: none"> • MCKPUB00001229 • OBN_MDL 1st Production 035469 • OBN_MDL 1st Production 059516 • OBN_MDL 1st Production 156153
302.	Shiyla A. Nix	<ul style="list-style-type: none"> • MCKPUB00005551 • OBN_MDL 1st Production 080783
303.	Edward Mugo Njoroge	<ul style="list-style-type: none"> • CUYAH_000028138 • MCKPUB00002569
304.	Jeffrey Norman	<ul style="list-style-type: none"> • CUYAH_000041260 • MCKPUB00003033 • MCKPUB00003035 • MCKPUB00003037
305.	Andrew P. Norris	<ul style="list-style-type: none"> • AKRON_001139534 • SUMMIT_000633096 • SUMMIT_000633119 • Summit County and City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants'

	Name	Sources
		<p>Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29</p> <ul style="list-style-type: none"> • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19
306.	Breane Jolan O'Brien	<ul style="list-style-type: none"> • MCKPUB00001530 • MCKPUB00001531 • MCKPUB00001536 • MCKPUB00001539 • OBN_MDL 1st Production 098951 • OBN_MDL 1st Production 113399
307.	Lisa Offord	<ul style="list-style-type: none"> • AKRON_000205318 • MCKPUB00017633 • MCKPUB00017635 • MCKPUB00017636 • MCKPUB00029026 • MCKPUB00029028 • MCKPUB00029029
308.	Brandy Lee Olinger	<ul style="list-style-type: none"> • AKRON_001142100 • MCKPUB00001513 • OBN_MDL 1st Production 021117
309.	Michael Christopher Oros	<ul style="list-style-type: none"> • MCKPUB00004482
310.	Richard L. Overdorf	<ul style="list-style-type: none"> • MCKPUB00005257 • MCKPUB00005259 • MCKPUB00025112

	Name	Sources
311.	Deborah Owens	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00002330 • MCKPUB00002331 • MCKPUB00002334
312.	Beth Marie Padulla	<ul style="list-style-type: none"> • OBN_MDL 1st Production 018725
313.	Shalese Patterson	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00005489 • MCKPUB00005490 • MCKPUB00005493
314.	Domenick Patty	<ul style="list-style-type: none"> • CUYAH_000038876 • MCKPUB00002452 • MCKPUB00002453 • MCKPUB00002455
315.	Gina Marie Paugh	<ul style="list-style-type: none"> • MCKPUB00002716
316.	Dan Paulk	<ul style="list-style-type: none"> • MCKPUB00025119 • MCKPUB00025120 • MCKPUB00025145 • MCKPUB00025148 • MCKPUB00025152
317.	Christina Lee Pearsall	<ul style="list-style-type: none"> • OBN_MDL 1st Production 000001 • OBN_MDL 1st Production 155386
318.	Kelly Michelle Pelter	<ul style="list-style-type: none"> • MCKPUB00003622 • OBN_MDL 1st Production 012869 • OBN_MDL 1st Production 035469
319.	Anthony H. Perry	<ul style="list-style-type: none"> • MCKPUB00025177 • MCKPUB00001310 • MCKPUB00001313

	Name	Sources
320.	Nelson E. Perry	<ul style="list-style-type: none"> • AKRON_001157926 • MCKPUB00025204 • MCKPUB00025205 • MCKPUB00025207
321.	Deirdre Anne Peters	<ul style="list-style-type: none"> • OBN_MDL 1st Production 038993 • OBN_MDL 1st Production 153407
322.	Christopher M. Petersen	<ul style="list-style-type: none"> • MCKPUB00001950 • MCKPUB00001951 • MCKPUB00001953 • OBN_MDL 1st Production 119052 • OBNMDL 1st Production 163503
323.	Rachel Joy Petti	<ul style="list-style-type: none"> • MCKPUB00005145 • OBN_MDL 1st Production 035469
324.	Kevin Phan	<ul style="list-style-type: none"> • CUYAH_000035518 • MCKPUB00003642 • MCKPUB00003643 • MCKPUB00003645
325.	Denise M. Phelps	<ul style="list-style-type: none"> • AKRON_000281601 • MCKPUB00002396 • MCKPUB00002398
326.	Ronald L. Phelps	<ul style="list-style-type: none"> • AKRON_000287339 • MCKPUB00005332 • MCKPUB00005334
327.	Alisa M. Pitmon	<ul style="list-style-type: none"> • MCKPUB00000919 • OBN_MDL 1st Production 098951
328.	Danielle Ann Pizzuli	<ul style="list-style-type: none"> • MCKPUB00002200 • OBN_MDL 1st Production 107561 • OBN_MDL 1st Production 161275

	Name	Sources
329.	Anthony Pollard	<ul style="list-style-type: none"> • CUYAH_000035737 • MCKPUB00001315 • MCKPUB00001316 • MCKPUB00001329
330.	Sharon Popil	<ul style="list-style-type: none"> • CUYAH_000036338 • MCKPUB00005501 • MCKPUB00005503 • MCKPUB00005506
331.	J'Nette Powe	<ul style="list-style-type: none"> • AKRON_001280294 • MCKPUB00025209 • MCKPUB00025210 • MCKPUB00025212
332.	Carl L. Powers	<ul style="list-style-type: none"> • CUYAH_000057440 • MCKPUB00001745 • MCKPUB00001746 • MCKPUB00001748
333.	Sarah Elizabeth Prem	<ul style="list-style-type: none"> • MCKPUB00005468 • OBN_MDL 1st Production 085996
334.	Phillip L. Prince	<ul style="list-style-type: none"> • CUYAH_000027745 • MCKPUB00005044 • MCKPUB00005045 • MCKPUB00005050
335.	David Race	<ul style="list-style-type: none"> • MCKPUB00002291 • OBN_MDL 1st Production 059516
336.	Destiny Ramos	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00002426 • MCKPUB00002427 • MCKPUB00002430
337.	Oscar R. Ramos	<ul style="list-style-type: none"> • CUYAH_000028834 • MCKPUB00004891 • MCKPUB00004892 • MCKPUB00004895

	Name	Sources
338.	Donna Ratica	<ul style="list-style-type: none"> • MCKPUB00025214 • MCKPUB00029030 • MCKPUB00029032 • MCKPUB00029035 • OBN_MDL 1st Production 003315
339.	Shaun M. Ray	<ul style="list-style-type: none"> • CUYAH_000036238 • MCKPUB00005508 • MCKPUB00005510 • MCKPUB00005512
340.	Peggy Ann Rayer	<ul style="list-style-type: none"> • OBN_MDL 1st Production 080783 • MCKPUB00004988
341.	Erin Elizabeth Reed	<ul style="list-style-type: none"> • OBN_MDL 1st Production 035469
342.	Charmin Reeves	<ul style="list-style-type: none"> • CLEVE_000331192 • MCKPUB00001879 • MCKPUB00029044 • OBN_MDL 1st Production 154383 • OBN_MDL 1st Production 074923
343.	Jennifer Lynn Reilly	<ul style="list-style-type: none"> • MCKPUB00003120 • OBN_MDL 1st Production 037202 • OBN_MDL 1st Production 160238
344.	Patrick R. Reinke	<ul style="list-style-type: none"> • CUYAH_000043481 • MCKPUB00004925
345.	Nicole Leeanne Rese	<ul style="list-style-type: none"> • MCKPUB00004806 • OBN_MDL 1st Production 021117 • OBN_MDL 1st Production 023282
346.	Linda Marie Reynolds	<ul style="list-style-type: none"> • MCKPUB00003956 • OBN_MDL 1st Production 003315

	Name	Sources
347.	Anthony E. Rhodes	<ul style="list-style-type: none"> • MCKPUB00025221 • MCKPUB00025222 • MCKPUB00025224 • MCKPUB00025227 • SUMMIT_000612623
348.	Richard A. Rice	<ul style="list-style-type: none"> • AKRON_001280479 • MCKPUB00025228 • MCKPUB00025229 • MCKPUB00025232
349.	Laura Ann Ringenbach	<ul style="list-style-type: none"> • MCKPUB00003822 • OBN_MDL 1st Production 021117
350.	Latonya S. Robinson	<ul style="list-style-type: none"> • MCKPUB00003816 • MCKPUB00003820 • OBN_MDL 1st Production 119052 • OBN_MDL 1st Production 155502 • OBN_MDL 1st Production 122353
351.	Christopher John Roch	<ul style="list-style-type: none"> • MCKPUB00001955 • MCKPUB00001956 • MCKPUB00001959 • OBN_MDL 1st Production 045533 • OBN_MDL 1st Production 157945
352.	John Roche	<ul style="list-style-type: none"> • CUYAH_000032325 • MCKPUB00003251 • MCKPUB00003252 • MCKPUB00003255
353.	Jason Roop	<ul style="list-style-type: none"> • CUYAH_000077025 • MCKPUB00003028 • MCKPUB00003029 • MCKPUB00003031
354.	Troy Roop	<ul style="list-style-type: none"> • CUYAH_000077025 • MCKPUB00006172 • MCKPUB00006173 • MCKPUB00006176

	Name	Sources
355.	Aimee Joanne Roscoe	<ul style="list-style-type: none"> • OBN_MDL 1st Production 016725 • OBN_MDL 1st Production 021117 • OBN_MDL 1st Production 161901 • MCKPUB00023746
356.	Dennie Rowland	<ul style="list-style-type: none"> • MCKPUB00002399 • MCKPUB00002401
357.	Kayla L. Royko	<ul style="list-style-type: none"> • OBN_MDL 1st Production 122353 • OBN_MDL 1st Production 163503 • MCKPUB00003601 • MCKPUB00003602 • MCKPUB00003604 • MCKPUB00029044
358.	Asia Tanay Rucker	<ul style="list-style-type: none"> • CUYAH_000066950 • MCKPUB00001476 • MCKPUB00001477 • MCKPUB00001482
359.	Daniel Michael Rush	<ul style="list-style-type: none"> • MCKPUB00002125 • OBN_MDL 1st Production 072083
360.	Lisa A. Rzeszotarski	<ul style="list-style-type: none"> • AKRON_001283454 • MCKPUB00025234 • MCKPUB00025235 • MCKPUB00025238
361.	Mohammad H. Saedi	<ul style="list-style-type: none"> • MCKPUB00004599 • MCKPUB00004600
362.	Diane Marie Salak (also known as Diane Krupka)	<ul style="list-style-type: none"> • OBN_MDL 1st Production 132477 • OBN_MDL 1st Production 150318
363.	Michael D. Salo	<ul style="list-style-type: none"> • CUYAH_000040713 • MCKPUB00004553 • MCKPUB00004554

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00004557
364.	Tricia Santangelo	<ul style="list-style-type: none"> • MCKPUB00006066 • OBN_MDL 1st Production 140843
365.	Antonio Santiago	<ul style="list-style-type: none"> • CUYAH_000034033 • MCKPUB00001332 • MCKPUB00001333 • MCKPUB00001336
366.	Amelia Frances Sartoski (former Amelia Housley)	<ul style="list-style-type: none"> • MCKPUB00000991 • OBN_MDL 1st Production 064580 • OBN_MDL 1st Production 107561
367.	Corey J. Schmidt	<ul style="list-style-type: none"> • CUYAH_000057956 • MCKPUB00002023 • MCKPUB00002024 • MCKPUB00002027
368.	Ronald Schueneman Jr.	<ul style="list-style-type: none"> • CUYAH_000054075 • MCKPUB00005344 • MCKPUB00005346 • MCKPUB00005351
369.	Meredith Jean Schuette	<ul style="list-style-type: none"> • CUYAH_000070936 • MCKPUB00004446 • OBN_MDL 1st Production 107561 • OBN_MDL 1st Production 161275
370.	Susan Leigh Schur (also known as Susan Leigh Nugent)	<ul style="list-style-type: none"> • MCKPUB00005811 • OBN_MDL 1st Production 059516 • OBN_MDL 1st Production 162423
371.	Shannon Nicole Schwoeble	<ul style="list-style-type: none"> • OBN_MDL 1st Production 038993 • OBN_MDL 1st Production 153407

	Name	Sources
372.	Megan Elisa Scolaro	<ul style="list-style-type: none"> • MCKPUB00004344 • OBN_MDL 1st Production 025835 • OBN_MDL 1st Production 025844
373.	Linda A. Sedivy	<ul style="list-style-type: none"> • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 155070
374.	Lia M. Seeber	<ul style="list-style-type: none"> • MCKPUB00003950 • MCKPUB00003951 • MCKPUB00003955
375.	Karen Angela Seguin	<ul style="list-style-type: none"> • CUYAH_000069179 • MCKPUB00029047 • MCKPUB00003341 • OBN_MDL 1st Production 098951 • OBN_MDL 1st Production 110764
376.	Kim Seltzer	<ul style="list-style-type: none"> • MCKPUB00003647 • MCKPUB00029060
377.	Erica Jean Seymour	<ul style="list-style-type: none"> • OBN_MDL 1st Production 083864
378.	Ben Earl Sherbert	<ul style="list-style-type: none"> • AKRON_001230790 • AKRON_001280930 • MCKPUB00001503 • MCKPUB00001506 • MCKPUB00001507
379.	Anthony F. Shue	<ul style="list-style-type: none"> • AKRON_000294564 • MCKPUB00001295 • MCKPUB00001296 • MCKPUB00001298
380.	Luis Sierra	<ul style="list-style-type: none"> • CUYAH_000081521 • MCKPUB00004169 • MCKPUB00004171 • MCKPUB00004174

	Name	Sources
381.	Shawn Michael Sindelar	<ul style="list-style-type: none"> • CUYAH_000028137 • OBN_MDL 1st Production 056992 • OBN_MDL 1st Production 162423 • MCKPUB00005514
382.	Carl Sisley	<ul style="list-style-type: none"> • CUYAH_000044020 • MCKPUB00001750 • MCKPUB00001751 • MCKPUB00001753
383.	Michael Joseph Slagle	<ul style="list-style-type: none"> • CUYAH_009003041 • MCKPUB00004519 • MCKPUB00004520 • MCKPUB00004525
384.	Jodi Slider	<ul style="list-style-type: none"> • CUYAH_000034041 • MCKPUB00003244 • MCKPUB00003245 • MCKPUB00003248
385.	Nanette Theresa Smalcer	<ul style="list-style-type: none"> • MCKPUB00004762
386.	Aryell Smith	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00001352 • MCKPUB00001353 • MCKPUB00001356
387.	Christy A. Soltay	<ul style="list-style-type: none"> • OBN_MDL 1st Production 125822 • OBN_MDL 1st Production 152729
388.	Angelo Isaiah Sommerville	<ul style="list-style-type: none"> • AKRON_000296839 • MCKPUB00001150 • MCKPUB00001151 • MCKPUB00001154 • MCKPUB00001190 • MCKPUB00006873 • MCKPUB00006875 • MCKPUB00006876 • MCKPUB00006878 • MCKPUB00006881

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00006883
389.	Annamaria Somogyi	<ul style="list-style-type: none"> • OBN_MDL 1st Production 059516 • OBN_MDL 1st Production 161275
390.	Heather Lynn Spirhanzl (also known as Heather Lynn Forinash)	<ul style="list-style-type: none"> • MCKPUB00002792 • OBN_MDL 1st Production 012869 • OBN_MDL 1st Production 029049
391.	Damien R. Stafford	<ul style="list-style-type: none"> • AKRON_001278733 • MCKPUB00025242 • MCKPUB00025246 • MCKPUB00025247
392.	Edward States	<ul style="list-style-type: none"> • CUYAH_000039144 • MCKPUB00002585 • MCKPUB00002586 • MCKPUB00002589
393.	Rachelle R. Stawicki	<ul style="list-style-type: none"> • MCKPUB00005175 • MCKPUB00005176 • MCKPUB00005178 • MCKPUB00005180 • OBN_MDL 1st Production 132477
394.	Reginald Stearns	<ul style="list-style-type: none"> • CUYAH_000071561 • MCKPUB00019486 • MCKPUB00019487 • MCKPUB00019492
395.	Maureen R. Stith	<ul style="list-style-type: none"> • OBN_MDL 1st Production 049841
396.	Jodi Ann Stokes	<ul style="list-style-type: none"> • MCKPUB00003217 • MCKPUB00003218 • MCKPUB00003221 • MCKPUB00003224 • OBN_MDL 1st Production 014736

	Name	Sources
		<ul style="list-style-type: none"> • OBN_MDL 1st Production 021117
397.	Pamela C. Stover (formerly known as Pamela Terry)	<ul style="list-style-type: none"> • OBN_MDL 1st Production 135369 • OBN_MDL 1st Production 150318
398.	Kathryn M. Struna	<ul style="list-style-type: none"> • MCKPUB00003445 • OBN_MDL 1st Production 021117
399.	Karen Svoboda	<ul style="list-style-type: none"> • MCKPUB00003391 • OBN_MDL 1st Production 000001
400.	Shinita Rainette Swails	<ul style="list-style-type: none"> • CUYAH_000081189 • MCKPUB00005544 • MCKPUB00005545 • MCKPUB00005547 • MCKPUB00005549 • OBN_MDL 1st Production 140843
401.	Brittany Sweeny	<ul style="list-style-type: none"> • CUYAH_006985926 • MCKPUB00001609 • MCKPUB00001610 • MCKPUB00001613
402.	Nicole Lynn Szymczyk (also known as Nicole Lynn Tackett)	<ul style="list-style-type: none"> • MCKPUB00004841 • OBN_MDL 1st Production 107561
403.	Sanita Annmarie Taylor	<ul style="list-style-type: none"> • OBN_MDL 1st Production 083864
404.	Michael Thies	<ul style="list-style-type: none"> • CUYAH_000038593 • MCKPUB00004560 • MCKPUB00004561 • MCKPUB00004564

	Name	Sources
405.	DeNeik Lashell Thoton	<ul style="list-style-type: none"> • MCKPUB00002375 • OBN_MDL 1st Production 031252 • OBN_MDL 1st Production 162189
406.	Terry T. Thurman	<ul style="list-style-type: none"> • CUYAH_000032210 • MCKPUB00005905 • MCKPUB00005906 • MCKPUB00005909
407.	Frances Torres	<ul style="list-style-type: none"> • CUYAH_000051819 • MCKPUB00002647 • MCKPUB00002648 • MCKPUB00002651
408.	Jessica L. Townsend	<ul style="list-style-type: none"> • AKRON_000205584 • MCKPUB00015605 • MCKPUB00015607 • MCKPUB00015608
409.	Mark S. Townsend	<ul style="list-style-type: none"> • AKRON_001228207 • MCKPUB00025250 • MCKPUB00025251 • MCKPUB00025253
410.	Amber D. Trusso	<ul style="list-style-type: none"> • MCKPUB00000963 • OBN_MDL 1st Production 031252 • OBN_MDL 1st Production 151237
411.	Christine Turner	<ul style="list-style-type: none"> • MCKPUB00001924 • OBN_MDL 1st Production 085996
412.	Dawn M. Turshon	<ul style="list-style-type: none"> • MCKPUB00002309 • OBN_MDL 1st Production 012869
413.	Cortney Louise Tylicki	<ul style="list-style-type: none"> • MCKPUB00002036

	Name	Sources
414.	Lauretta A. Umana-Kipp	<ul style="list-style-type: none"> • MCKPUB00003915 • OBN_MDL 1st Production 018725
415.	Lisa Ann Urich	<ul style="list-style-type: none"> • OBN_MDL 1st Production 003315
416.	Dustin Thomas Van Der Voort	<ul style="list-style-type: none"> • MCKPUB00002513 • OBN_MDL 1st Production 11399
417.	Robert Van Maele	<ul style="list-style-type: none"> • MCKPUB00005291 • MCKPUB00005293 • MCKPUB00005295 • MCKPUB00005297 • OBN_MDL 1st Production 014736 • OBN_MDL 1st Production 018725
418.	Neidalyz Vazquez	<ul style="list-style-type: none"> • CUYAH_000032685 • MCKPUB00004771 • MCKPUB00004772 • MCKPUB00004775
419.	Anthony M. Velleca	<ul style="list-style-type: none"> • AKRON_001157344 • MCKPUB00025255 • MCKPUB00025256 • MCKPUB00025258
420.	Jessica Sara Velsor	<ul style="list-style-type: none"> • OBN_MDL 1st Production 054509 • OBN_MDL 1st Production 156153
421.	Melissa K. Veverka	<ul style="list-style-type: none"> • CUYAH_000052729 • MCKPUB00004424
422.	Randy Vodicka	<ul style="list-style-type: none"> • CUYAH_000039960 • MCKPUB00005181 • MCKPUB00005182 • MCKPUB00005185

	Name	Sources
423.	Justin C. Wagner	<ul style="list-style-type: none"> • AKRON_001217713 • MCKPUB00025262 • MCKPUB00025263 • MCKPUB00025266
424.	Rachel H. Wallace	<ul style="list-style-type: none"> • MCKPUB00005131 • MCKPUB00005133 • MCKPUB00005136 • MCKPUB00005138
425.	Luciano R. Waller	<ul style="list-style-type: none"> • CUYAH_000052154 • MCKPUB00004157 • MCKPUB00004158 • MCKPUB00004160
426.	Melanie Anne Walter	<ul style="list-style-type: none"> • MCKPUB00004356 • OBN_MDL 1st Production 037202
427.	Rachel Ann Walters	<ul style="list-style-type: none"> • MCKPUB00005116 • OBN_MDL 1st Production 054509 • OBN_MDL 1st Production 156153
428.	Jamie Ward	<ul style="list-style-type: none"> • OBN_MDL 1st Production 003315
429.	Andre Warren	<ul style="list-style-type: none"> • MCKPUB00006597 • MCKPUB00006599 • MCKPUB00006606
430.	Carl Watkins	<ul style="list-style-type: none"> • CUYAH_000032685 • MCKPUB00001756 • MCKPUB00001757 • MCKPUB00001760
431.	Candi Webb	<ul style="list-style-type: none"> • MCKPUB00001721 • MCKPUB00001723

	Name	Sources
432.	Charles Webster	<ul style="list-style-type: none"> • CUYAH_014631775 • MCKPUB00001858 • MCKPUB00001859 • MCKPUB00001864
433.	Herman Weaver	<ul style="list-style-type: none"> • MCKPUB00023800 • MCKPUB00023801 • MCKPUB00023806 • MCKPUB00024567
434.	Cassandra Welch	<ul style="list-style-type: none"> • CUYAH_000034490 • MCKPUB00001782 • MCKPUB00001783 • MCKPUB00001786
435.	Joshua Weppelman	<ul style="list-style-type: none"> • CUYAH_000038083 • MCKPUB00003278 • MCKPUB00003279 • MCKPUB00003284
436.	Robert West	<ul style="list-style-type: none"> • CUYAH_000035016 • MCKPUB00005299 • MCKPUB00005300 • MCKPUB00005307
437.	Derrick L. Whatley	<ul style="list-style-type: none"> • AKRON_001160846 • SUMMIT_000467880 • SUMMIT_000467882 • SUMMIT_000467886 • SUMMIT_000467888 • SUMMIT_000467910 • Summit County and City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants' Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and

	Name	Sources
		Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19
438.	Philip Whited	<ul style="list-style-type: none"> • AKRON_001247770 • AKRON_001247771 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29
439.	Meagan Leigh Wickline	<ul style="list-style-type: none"> • MCKPUB00004330 • OBN_MDL 1st Production 085996
440.	Rickeay Wilford	<ul style="list-style-type: none"> • CUYAH_000036860 • MCKPUB00005262 • MCKPUB00005263 • MCKPUB00005266
441.	Charlie Williams Jr.	<ul style="list-style-type: none"> • CUYAH_000054791 • MCKPUB00001872 • MCKPUB00001873 • MCKPUB00001876
442.	Felicia Williams	<ul style="list-style-type: none"> • AKRON_001157883 • MCKPUB00025268 • MCKPUB00025269 • MCKPUB00025271
443.	Kenneth Williams	<ul style="list-style-type: none"> • CUYAH_000028203 • MCKPUB00003629 • MCKPUB00003630 • MCKPUB00003637
444.	William Winca	<ul style="list-style-type: none"> • CUYAH_000036646 • MCKPUB00006205 • MCKPUB00006207 • MCKPUB00006210

	Name	Sources
445.	Calvin Winston	<ul style="list-style-type: none"> • CUYAH_000038947 • MCKPUB00001714 • MCKPUB00001715 • MCKPUB00001718
446.	Robert Wiseman	<ul style="list-style-type: none"> • AKRON_000336020 • AKRON_000369539 • AKRON_000369555 • Summit County and City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants' Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29 • Summit County and City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19
447.	Clarissa Marie Witchey	<ul style="list-style-type: none"> • MCKPUB00001997 • OBN_MDL 1st Production 102044
448.	Charles P. Wolfe	<ul style="list-style-type: none"> • AKRON_001157223 • MCKPUB00025273 • MCKPUB00025275 • MCKPUB00025276 • MCKPUB00025279 • MCKPUB00025282 • MCKPUB00025284 • MCKPUB00025285 • MCKPUB00025287 • SUMMIT_000368345 • SUMMIT_000368383 • SUMMIT_000374372 • SUMMIT_000374414 • SUMMIT_000390394

	Name	Sources
449.	Julia Anne Workman	<ul style="list-style-type: none"> • MCKPUB00003642 • OBN_MDL 1st Production 003315
450.	James A. Wooley	<ul style="list-style-type: none"> • MCKPUB00003643 • OBN_MDL 1st Production 003315
451.	David Wright	<ul style="list-style-type: none"> • MCKPUB00003644 • OBN_MDL 1st Production 003315
452.	Courtney Irene Yates	<ul style="list-style-type: none"> • MCKPUB00003645 • OBN_MDL 1st Production 003315
453.	Lottie Susan Yeager	<ul style="list-style-type: none"> • MCKPUB00003646 • OBN_MDL 1st Production 003315
454.	Kristian D. Yingling	<ul style="list-style-type: none"> • MCKPUB00029065 • OBN_MDL 1st Production 003315
455.	Charles Yonkings	<ul style="list-style-type: none"> • CUYAH_000044641 • MCKPUB00008901 • MCKPUB00008902 • MCKPUB00008905
456.	Margaret Mary Zalar	<ul style="list-style-type: none"> • OBN_MDL 1st Production 031252 • OBN_MDL 1st Production 160119 • MCKPUB00004195
457.	Jennifer R. Zarick	<ul style="list-style-type: none"> • MCKPUB00003161 • OBN_MDL 1st Production 132477 • OBN_MDL 1st Production 152729

	Name	Sources
458.	Lee Alexander Zartman	<ul style="list-style-type: none"> • MCKPUB00003927 • OBN_MDL 1st Production 031252
459.	Michael Zebrowski	<ul style="list-style-type: none"> • MCKPUB00004567 • OBN_MDL 1st Production 059516
460.	Jenna Lynn Zolensky	<ul style="list-style-type: none"> • MCKPUB00003039 • OBN_MDL 1st Production 074923 • OBN_MDL 1st Production 080783

IV. Individuals Involved In The Distribution And Sale Of Illegal Opioids, Including Heroin, Illicit Fentanyl, And Carfentanil

At least 701 individuals in Cuyahoga and Summit Counties: (1) were indicted, with pending charges (19 individuals or entities); and/or (2) were convicted or pled guilty (685 individuals), all for conduct related to trafficking of illegal opioids, including (among others) heroin, fentanyl, and carfentanil.

	Name	Sources
1.	Vincente Acevedo	<ul style="list-style-type: none"> • CUYAH_000033836 • MCKPUB00022712 • MCKPUB00022714 • MCKPUB00022719
2.	Ismael Jacinto Acosta	<ul style="list-style-type: none"> • MCKPUB00014185 • MCKPUB00014260 • MCKPUB00014267 • MCKPUB00014278 • MCKPUB00025296 • MCKPUB00025379 • MCKPUB00025386 • MCKPUB00029093
3.	Valerio Adames	<ul style="list-style-type: none"> • CUYAH_000032923 • MCKPUB00022433 • MCKPUB00022434 • MCKPUB00022436

	Name	Sources
4.	Derrick A. Adams II	<ul style="list-style-type: none"> • MCKPUB00010474 • MCKPUB00010482 • MCKPUB00010486
5.	Clyde Adkins	<ul style="list-style-type: none"> • MCKPUB00009052 • MCKPUB00009054 • MCKPUB00009058
6.	Kevin Adkins	<ul style="list-style-type: none"> • MCKPUB00016290 • MCKPUB00016296 • MCKPUB00016298 • MCKPUB00016316 • MCKPUB00016324 • MCKPUB00029096
7.	Deandre S. Agree	<ul style="list-style-type: none"> • MCKPUB00010361 • MCKPUB00010362 • MCKPUB00010364
8.	Brittany Akers	<ul style="list-style-type: none"> • AKRON_000201538 • MCKPUB00008224 • MCKPUB00008226 • MCKPUB00008227
9.	Carl Akins	<ul style="list-style-type: none"> • MCKPUB00008268 • MCKPUB00008270 • MCKPUB00008474 • MCKPUB00008476 • MCKPUB00008283
10.	Dantez D. Alexander	<ul style="list-style-type: none"> • CUYAH_000028383 • MCKPUB00009580 • MCKPUB00009582 • MCKPUB00009586
11.	Darnell Alexander	<ul style="list-style-type: none"> • MCKPUB00009625 • MCKPUB00009816 • MCKPUB00009818 • MCKPUB00009829 • MCKPUB00009831

	Name	Sources
12.	Donte Alexander	<ul style="list-style-type: none"> • AKRON_000208641 • MCKPUB00011566 • MCKPUB00011568 • MCKPUB00011570 • MCKPUB00011571 • MCKPUB00011572 • MCKPUB00011576
13.	Michael Alexander	<ul style="list-style-type: none"> • MCKPUB00018614 • MCKPUB00018616 • MCKPUB00018618 • MCKPUB00018629
14.	Tiffany M. Alston	<ul style="list-style-type: none"> • CUYAH_000032751 • MCKPUB00022172 • MCKPUB00022174 • MCKPUB00022176
15.	Luis Alvarez	<ul style="list-style-type: none"> • CUYAH_000034094 • MCKPUB00017689 • MCKPUB00017690 • MCKPUB00017693
16.	Maycon Alvarez	<ul style="list-style-type: none"> • AKRON_000207436 • AKRON_000220829 • MCKPUB00018560 • MCKPUB00018563 • MCKPUB00018567 • MCKPUB00018568
17.	Jonnell L. Ammons	<ul style="list-style-type: none"> • MCKPUB00015798 • MCKPUB00015792 • MCKPUB00015800 • MCKPUB00015809 • MCKPUB00015810 • MCKPUB00015813 • MCKPUB00015814 • MCKPUB00015815 • MCKPUB00015817 • MCKPUB00015819 • MCKPUB00015806 • MCKPUB00029097

	Name	Sources
18.	Garrett L. Anderson	<ul style="list-style-type: none"> • CUYAH_000079266 • MCKPUB00013524 • MCKPUB00013525 • MCKPUB00013527
19.	John F. Anderson	<ul style="list-style-type: none"> • CUYAH_000039975 • MCKPUB00015660 • MCKPUB00015661 • MCKPUB00015664
20.	Alex Raysean Andrus	<ul style="list-style-type: none"> • AKRON_000201567 • MCKPUB00006294 • MCKPUB00006295 • MCKPUB00006296
21.	Efrain Anglero	<ul style="list-style-type: none"> • CUYAH_000032221 • MCKPUB00012253 • MCKPUB00012254 • MCKPUB00012256
22.	Robert Anglesino	<ul style="list-style-type: none"> • CUYAH_000039490 • MCKPUB00019606 • MCKPUB00019607 • MCKPUB00019610
23.	Terrance A. Anthony	<ul style="list-style-type: none"> • AKRON_000289540 • MCKPUB00021603 • MCKPUB00021605 • MCKPUB00021606
24.	Donnie R. Antoine	<ul style="list-style-type: none"> • AKRON_001156524 • MCKPUB00025389 • MCKPUB00025390 • MCKPUB00025392
25.	Flor Arroyo	<ul style="list-style-type: none"> • CUYAH_000043787 • MCKPUB00013022 • MCKPUB00013023 • MCKPUB00013028

	Name	Sources
26.	Antoin Austin	<ul style="list-style-type: none"> • MCKPUB00006957 • MCKPUB00006964 • MCKPUB00006966 • MCKPUB00006974 • MCKPUB00006978 • MCKPUB00006981
27.	Dustin C. Austin	<ul style="list-style-type: none"> • MCKPUB00025394 • MCKPUB00025395 • MCKPUB00025397 • MCKPUB00025398
28.	Lanell L. Austin	<ul style="list-style-type: none"> • AKRON_000201657 • MCKPUB00017109 • MCKPUB00017110
29.	Todd S. Austin	<ul style="list-style-type: none"> • AKRON_000200898 • AKRON_000281858 • MCKPUB00022239 • MCKPUB00022241 • MCKPUB00022242
30.	Joseph Aveni	<ul style="list-style-type: none"> • CUYAH_000025888 • MCKPUB00015926 • MCKPUB00015927 • MCKPUB00015931
31.	Alvin D. Bailey	<ul style="list-style-type: none"> • AKRON_000204690 • MCKPUB00006534 • MCKPUB00006536 • MCKPUB00006537
32.	Reginald P. Baker	<ul style="list-style-type: none"> • CUYAH_000028012 • MCKPUB00019479 • MCKPUB00019480 • MCKPUB00019484
33.	Troy Baker	<ul style="list-style-type: none"> • MCKPUB00022345 • MCKPUB00022347 • MCKPUB00022349 • MCKPUB00022351

	Name	Sources
34.	Octavio Barragan-Manzo	<ul style="list-style-type: none"> • MCKPUB00019093 • MCKPUB00019100 • MCKPUB00019103 • MCKPUB00019110 • MCKPUB00019115 • MCKPUB00029099
35.	Ricardo Barrett	<ul style="list-style-type: none"> • CUYAH_000036066 • MCKPUB00019535 • MCKPUB00019536 • MCKPUB00019538
36.	Kalvin O. Barry	<ul style="list-style-type: none"> • CUYAH_000026289 • MCKPUB00016013 • MCKPUB00016015 • MCKPUB00016017
37.	Brandon Bartoe	<ul style="list-style-type: none"> • AKRON_000286744 • MCKPUB00007669 • MCKPUB00007671 • MCKPUB00007673 • MCKPUB00007674 • SUMMIT_000645466
38.	William R. Barton	<ul style="list-style-type: none"> • AKRON_001277061 • MCKPUB00025400 • MCKPUB00025401 • MCKPUB00025403
39.	Brandy M. Bates	<ul style="list-style-type: none"> • MCKPUB00007926 • MCKPUB00007932 • MCKPUB00007945 • MCKPUB00007947 • MCKPUB00025405 • MCKPUB00025444
40.	Keith Bearden	<ul style="list-style-type: none"> • CUYAH_000072825 • MCKPUB00016050 • MCKPUB00016051 • MCKPUB00016054

	Name	Sources
41.	Tydon Beaver	<ul style="list-style-type: none"> • AKRON_000286744 • MCKPUB00022359 • MCKPUB00022360 • MCKPUB00022362 • MCKPUB00022363 • SUMMIT_000645542
42.	Keith Beavers	<ul style="list-style-type: none"> • AKRON_000288039 • MCKPUB00016056 • MCKPUB00016058 • MCKPUB00016059
43.	Jonathan Becker	<ul style="list-style-type: none"> • MCKPUB00015680 • MCKPUB00015683 • SUMMIT_000031572
44.	Beneditto Belfiore	<ul style="list-style-type: none"> • MCKPUB00007588 • MCKPUB00007590 • MCKPUB00007592 • MCKPUB00007604 • MCKPUB00007606
45.	Robert Belk	<ul style="list-style-type: none"> • MCKPUB00019613 • MCKPUB00019804 • MCKPUB00019810 • MCKPUB00019821 • MCKPUB00019823 • MCKPUB00025635
46.	Edgardo Beltran	<ul style="list-style-type: none"> • CUYAH_000033768 • MCKPUB00011908 • MCKPUB00011909 • MCKPUB00011912
47.	Timothy I. Benford, Jr.	<ul style="list-style-type: none"> • AKRON_001126044 • MCKPUB00025671 • MCKPUB00025673 • MCKPUB00025674
48.	Marlon L. Benn	<ul style="list-style-type: none"> • CUYAH_000031349 • MCKPUB00018261 • MCKPUB00018262

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00018265
49.	Ernest Eugene Bennett	<ul style="list-style-type: none"> • AKRON_001219892 • MCKPUB00025676 • MCKPUB00025677 • MCKPUB00025681
50.	Timothy Bennett II	<ul style="list-style-type: none"> • CUYAH_000044349 • MCKPUB00022178 • MCKPUB00022179 • MCKPUB00022183
51.	Martin Bido	<ul style="list-style-type: none"> • CUYAH_000035319 • MCKPUB00018280 • MCKPUB00018281 • MCKPUB00018286
52.	Todd B. Bittner	<ul style="list-style-type: none"> • AKRON_000295612 • MCKPUB00022236 • MCKPUB00022238
53.	Stevenson Black	<ul style="list-style-type: none"> • MCKPUB00021193 • MCKPUB00021384 • MCKPUB00021389 • MCKPUB00021401 • MCKPUB00021404
54.	Demetric Deshaun Blackwell	<ul style="list-style-type: none"> • AKRON_000204877 • MCKPUB00010402 • MCKPUB00010404 • MCKPUB00010405
55.	Dominique Blair	<ul style="list-style-type: none"> • MCKPUB00011050 • MCKPUB00011241 • MCKPUB00011253 • MCKPUB00011256 • MCKPUB00029100

	Name	Sources
56.	Carl J. Blake	<ul style="list-style-type: none"> • AKRON_000286465 • MCKPUB00008498 • MCKPUB00008500 • MCKPUB00008501
57.	Latrice Blevins	<ul style="list-style-type: none"> • MCKPUB00011256 • MCKPUB00017137 • MCKPUB00017328 • MCKPUB00017332 • MCKPUB00017345
58.	Marcus Blue	<ul style="list-style-type: none"> • MCKPUB00017940 • MCKPUB00018131 • MCKPUB00018133 • MCKPUB00018147 • MCKPUB00018149
59.	Anthony Board, Jr.	<ul style="list-style-type: none"> • MCKPUB00006892 • MCKPUB00006901 • MCKPUB00006904 • MCKPUB00006906 • MCKPUB00006907 • MCKPUB00006914 • MCKPUB00025685 • MCKPUB00025692 • MCKPUB00029102
60.	Delena Bolden	<ul style="list-style-type: none"> • CUYAH_000074377 • MCKPUB00010391 • MCKPUB00010392 • MCKPUB00010399
61.	Joseph C. Bolinger	<ul style="list-style-type: none"> • AKRON_00200794 • MCKPUB00015933 • MCKPUB00015935 • MCKPUB00015936
62.	Elliott Bonner	<ul style="list-style-type: none"> • CUYAH_000032528 • MCKPUB00012278 • MCKPUB00012279 • MCKPUB00012286

	Name	Sources
63.	Christopher Bowen	<ul style="list-style-type: none"> • MCKPUB00008923 • MCKPUB00008946 • MCKPUB00008951 • MCKPUB00008953 • MCKPUB00008955 • MCKPUB00008958 • MCKPUB00008960 • MCKPUB00008965 • MCKPUB00025716
64.	Gerald Bowerman	<ul style="list-style-type: none"> • MCKPUB00013570 • MCKPUB00013572 • MCKPUB00013575 • MCKPUB00013581 • MCKPUB00013583
65.	Andrew R. Bowers	<ul style="list-style-type: none"> • AKRON_000206068 • AKRON_000223279 • MCKPUB00006836 • MCKPUB00006837 • MCKPUB00006839 • MCKPUB00006840
66.	Alexander J. Bowles	<ul style="list-style-type: none"> • MCKPUB00025728 • MCKPUB00025732 • MCKPUB00025733 • MCKPUB00025736 • SUMMIT_000375431
67.	Peter L. Boyd	<ul style="list-style-type: none"> • AKRON_000203371 • AKRON_001274723 • MCKPUB00025738 • MCKPUB00025739 • MCKPUB00025742 • MCKPUB00025744
68.	Rodney Boyd	<ul style="list-style-type: none"> • MCKPUB00020239 • MCKPUB00020240 • MCKPUB00020242

	Name	Sources
69.	Stuart J. Boykin	<ul style="list-style-type: none"> • MCKPUB00021408 • MCKPUB00021410 • MCKPUB00021417 • MCKPUB00021418 • MCKPUB00021431 • MCKPUB00021433 • MCKPUB00025748 • MCKPUB00025757 • MCKPUB00029111
70.	Germine Bradley	<ul style="list-style-type: none"> • MCKPUB00013592 • MCKPUB00013604 • MCKPUB00013606 • MCKPUB00013607 • MCKPUB00013609 • MCKPUB00013611 • MCKPUB00013613 • MCKPUB00013615 • MCKPUB00013617 • MCKPUB00013620
71.	Javion L. Brandon	<ul style="list-style-type: none"> • AKRON_000221651 • MCKPUB00015367 • MCKPUB00015369 • MCKPUB00015370
72.	Vernita Brent	<ul style="list-style-type: none"> • CUYAH_000033971 • MCKPUB00022446 • MCKPUB00022447 • MCKPUB00022450
73.	Sharod J. Britt	<ul style="list-style-type: none"> • AKRON_000205747 • AKRON_000286790 • MCKPUB00020904 • MCKPUB00020906 • MCKPUB00020907
74.	Davell L. Brock	<ul style="list-style-type: none"> • MCKPUB00009978 • MCKPUB00009980 • MCKPUB00009981 • MCKPUB00009984

	Name	Sources
75.	Howard Brockman, Jr.	<ul style="list-style-type: none"> • AKRON_001279859 • MCKPUB00025826 • MCKPUB00025827 • MCKPUB00025829
76.	Lewis Brooks	<ul style="list-style-type: none"> • CUYAH_000024875 • MCKPUB00017628 • MCKPUB00017629 • MCKPUB00017631
77.	Ricky Lamar Brooks	<ul style="list-style-type: none"> • AKRON_000201799 • MCKPUB00019589 • MCKPUB00019591 • MCKPUB00019592
78.	Adolph R. Brown, Sr.	<ul style="list-style-type: none"> • AKRON_000205137 • MCKPUB00006243 • MCKPUB00006268 • MCKPUB00006272 • MCKPUB00006274 • MCKPUB00006275 • MCKPUB00006276 • MCKPUB00029112
79.	Chad Brown	<ul style="list-style-type: none"> • CUYAH_000039490 • MCKPUB00008861 • MCKPUB00008862 • MCKPUB00008866
80.	Diiion J. Brown	<ul style="list-style-type: none"> • CUYAH_000030101 • MCKPUB00010824 • MCKPUB00010825 • MCKPUB00010828
81.	Melton J. Brown	<ul style="list-style-type: none"> • AKRON_001273928 • MCKPUB00025831 • MCKPUB00025832 • MCKPUB00025834
82.	Rudius Abijah Brown	<ul style="list-style-type: none"> • CUYAH_000025876 • MCKPUB00005388 • MCKPUB00005390 • MCKPUB00005393

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00020588 • MCKPUB00020589 • MCKPUB00020591
83.	Detroit Demorriß Brown-Yates	<ul style="list-style-type: none"> • AKRON_000290350 • MCKPUB00010586 • MCKPUB00010588 • MCKPUB00010589
84.	Tennille Bryant	<ul style="list-style-type: none"> • MCKPUB00021497 • MCKPUB00021580 • MCKPUB00021587 • MCKPUB00021595
85.	Michael Buchanan	<ul style="list-style-type: none"> • MCKPUB00018631 • MCKPUB00018635 • MCKPUB00018646 • MCKPUB00018648 • MCKPUB00018633
86.	Terri Buckner	<ul style="list-style-type: none"> • CUYAH_000070777 • MCKPUB00021862 • MCKPUB00021863 • MCKPUB00021865
87.	James Buell	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00014991 • MCKPUB00014994 • MCKPUB00014996 • MCKPUB00014997
88.	Vernon R. Buffington	<ul style="list-style-type: none"> • CUYAH_000025876 • MCKPUB00022453 • MCKPUB00022454 • MCKPUB00022457
89.	Barbara Burncheck	<ul style="list-style-type: none"> • CUYAH_000036103 • MCKPUB00007566 • MCKPUB00007567 • MCKPUB00007569

	Name	Sources
90.	Michael T. Butts	<ul style="list-style-type: none"> • CUYAH_014631409 • CUYAH_014631435 • MCKPUB00024468 • MCKPUB00024470 • MCKPUB00024473
91.	Jonah M. Byard	<ul style="list-style-type: none"> • AKRON_001157001 • MCKPUB00025838 • MCKPUB00025839 • MCKPUB00025841
92.	Roderick A. Byrd	<ul style="list-style-type: none"> • MCKPUB00020218 • MCKPUB00020219 • MCKPUB00020220 • MCKPUB00020221 • MCKPUB00020222
93.	Edwin O. Cain III	<ul style="list-style-type: none"> • AKRON_000296704 • MCKPUB00012219 • MCKPUB00012226 • MCKPUB00012229 • MCKPUB00012231 • MCKPUB00012233 • MCKPUB00012239 • MCKPUB00012240 • MCKPUB00012249 • MCKPUB00012251 • MCKPUB00012252 • MCKPUB00025843
94.	Reiko Calmese	<ul style="list-style-type: none"> • AKRON_000205036 • MCKPUB00019495 • MCKPUB00019497 • MCKPUB00019498
95.	Tyrone Cammon	<ul style="list-style-type: none"> • MCKPUB00022370 • MCKPUB00022376 • MCKPUB00022380 • MCKPUB00022381 • MCKPUB00022384 • MCKPUB00022386 • MCKPUB00022387 • MCKPUB00022389

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00022391 • MCKPUB00022392 • MCKPUB00022394 • MCKPUB00022396 • MCKPUB00022397 • MCKPUB00022399 • MCKPUB00022401 • MCKPUB00022408 • MCKPUB00025873
96.	Glenn Campbell	<ul style="list-style-type: none"> • AKRON_001217583 • MCKPUB00025875 • MCKPUB00025876 • MCKPUB00025879
97.	Pierre Campbell	<ul style="list-style-type: none"> • MCKPUB00019299 • MCKPUB00019305 • MCKPUB00019306 • MCKPUB00019323 • MCKPUB00019325 • MCKPUB00019328 • MCKPUB00019329
98.	Raymond L. Canales	<ul style="list-style-type: none"> • CUYAH_000035145 • MCKPUB00019426 • MCKPUB00019427 • MCKPUB00019429
99.	Alvin Caraballo	<ul style="list-style-type: none"> • CUYAH_000043787 • MCKPUB00006539 • MCKPUB00006540 • MCKPUB00006543
100.	Bryan James Carney	<ul style="list-style-type: none"> • AKRON_000201407 • MCKPUB00008174 • MCKPUB00008237 • MCKPUB00008238 • MCKPUB00008240 • MCKPUB00008241

	Name	Sources
101.	Sandra Carte	<ul style="list-style-type: none"> • CUYAH_000033229 • MCKPUB00020871 • MCKPUB00020872 • MCKPUB00020875
102.	Danielle M. Carter	<ul style="list-style-type: none"> • AKRON_000205625 • AKRON_000288343 • MCKPUB00009511 • MCKPUB00009512 • MCKPUB00009515 • MCKPUB00009517 • MCKPUB00009520
103.	Genevus Carter	<ul style="list-style-type: none"> • AKRON_000290719 • MCKPUB00013558 • MCKPUB00013559 • MCKPUB00013563 • MCKPUB00013567 • MCKPUB00029114 • SUMMIT_000681607
104.	Gregory Brian Carter	<ul style="list-style-type: none"> • AKRON_000228418 • MCKPUB00013666 • MCKPUB00013668 • MCKPUB00013669
105.	Tevin Carter	<ul style="list-style-type: none"> • CUYAH_000078887 • MCKPUB00021932 • MCKPUB00021933 • MCKPUB00021935
106.	James Carver	<ul style="list-style-type: none"> • MCKPUB00014998 • MCKPUB00015081 • MCKPUB00015090 • MCKPUB00015104 • MCKPUB00015118 • MCKPUB00025882 • MCKPUB00029116
107.	Claudia Cazarez-Quintero	<ul style="list-style-type: none"> • MCKPUB00009021 • MCKPUB00009026 • MCKPUB00009029 • MCKPUB00009037

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00009043
108.	William A. Checo	<ul style="list-style-type: none"> • CUYAH_000032629 • MCKPUB00022733 • MCKPUB00022734 • MCKPUB00022737
109.	David M. Cheeks	<ul style="list-style-type: none"> • CUYAH_000021917 • MCKPUB00010201 • MCKPUB00010202 • MCKPUB00010209
110.	Deon Antonio Christian	<ul style="list-style-type: none"> • AKRON_000206111 • AKRON_000296366 • MCKPUB00010426 • MCKPUB00010428 • MCKPUB00010429 • MCKPUB00010430 • MCKPUB00010432 • MCKPUB00010433
111.	Terry Lee Christian	<ul style="list-style-type: none"> • MCKPUB00021886 • MCKPUB00021887 • MCKPUB00021890 • MCKPUB00021892 • MCKPUB00021893 • MCKPUB00021895
112.	Andre R. Clark	<ul style="list-style-type: none"> • AKRON_000292867 • MCKPUB00006593 • MCKPUB00006595 • MCKPUB00006596
113.	Bernard Clark	<ul style="list-style-type: none"> • CUYAH_000020975 • CUYAH_000032973 • CUYAH_000079139 • MCKPUB00007614 • MCKPUB00007615 • MCKPUB00007621 • MCKPUB00007624 • MCKPUB00007625

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00007632 • MCKPUB00007634 • MCKPUB00007635 • MCKPUB00007640
114.	Monique Sharay Clemons	<ul style="list-style-type: none"> • CUYAH_000032751 • MCKPUB00018997 • MCKPUB00018998 • MCKPUB00019000
115.	Davonte Clepper	<ul style="list-style-type: none"> • AKRON_001128716 • AKRON_001221663 • MCKPUB00025925 • MCKPUB00025926 • MCKPUB00025929 • MCKPUB00025932 • MCKPUB00025933 • MCKPUB00025935 • MCKPUB00025937
116.	Michael Cleveland	<ul style="list-style-type: none"> • MCKPUB00018652 • MCKPUB00018656 • MCKPUB00018659 • MCKPUB00018666 • MCKPUB00018667 • MCKPUB00018669 • MCKPUB00018671 • MCKPUB00018673 • MCKPUB00029159
117.	Paul A. Cline, Jr.	<ul style="list-style-type: none"> • CUYAH_000067870 • MCKPUB00019253 • MCKPUB00019254 • MCKPUB00019259
118.	Tonio Coffey	<ul style="list-style-type: none"> • AKRON_000205517 • MCKPUB00022250 • MCKPUB00022252 • MCKPUB00022253 • MCKPUB00022254 • MCKPUB00022257

	Name	Sources
119.	Dora L. Colbert (also known as Dora Bingham)	<ul style="list-style-type: none"> AKRON_001157134 MCKPUB00025940 MCKPUB00025941 MCKPUB00025944
120.	Tyler K. Colbert	<ul style="list-style-type: none"> AKRON_001216262 MCKPUB00025947 MCKPUB00025948 MCKPUB00025950
121.	Royce A. Colburne	<ul style="list-style-type: none"> AKRON_000207131 MCKPUB00020572 MCKPUB00020575
122.	Granville Christopher Collins	<ul style="list-style-type: none"> AKRON_000205596 MCKPUB00013661 MCKPUB00013663 MCKPUB00013664
123.	Reginald Collins	<ul style="list-style-type: none"> AKRON_001230697 MCKPUB00025952 MCKPUB00025953 MCKPUB00025955
124.	Eric Cook	<ul style="list-style-type: none"> CUYAH_000074939 MCKPUB00012521 MCKPUB00012522 MCKPUB00012527
125.	George Cook	<ul style="list-style-type: none"> AKRON_001144906 MCKPUB00025957 MCKPUB00025958 MCKPUB00025960
126.	Da'zaun L. Coppinger	<ul style="list-style-type: none"> AKRON_000298571 MCKPUB00010343 MCKPUB00010345 MCKPUB00010346
127.	Malik D. Corbin	<ul style="list-style-type: none"> AKRON_000297011 MCKPUB00017924 MCKPUB00017927

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		<ul style="list-style-type: none"> • MCKPUB00017928
128.	Kristopher Courtney	<ul style="list-style-type: none"> • MCKPUB00016638 • MCKPUB00016652 • MCKPUB00016656 • MCKPUB00016662 • MCKPUB00016664 • MCKPUB00016666 • MCKPUB00025976
129.	Jadonta J. Cousins	<ul style="list-style-type: none"> • AKRON_000220047 • MCKPUB00014764 • MCKPUB00014767 • MCKPUB00014768
130.	Jack D. Couts	<ul style="list-style-type: none"> • AKRON_000201538 • MCKPUB00014493 • MCKPUB00014494 • MCKPUB00014496 • MCKPUB00014497
131.	Wendell Cox	<ul style="list-style-type: none"> • CUYAH_000029676 • MCKPUB00022721 • MCKPUB00022722 • MCKPUB00022725
132.	Anfenee J. Crandall	<ul style="list-style-type: none"> • AKRON_000203254 • SUMMIT_000788689 • MCKPUB00026014 • MCKPUB00026018 • MCKPUB00026020
133.	Erica M. Crawford	<ul style="list-style-type: none"> • CUYAH_000070777 • MCKPUB00012777 • MCKPUB00012778 • MCKPUB00012780
134.	Amy L. Croft	<ul style="list-style-type: none"> • AKRON_000201101 • MCKPUB00006569 • MCKPUB00006571 • MCKPUB00006572

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00006575 • MCKPUB00006579
135.	Andres Cruz	<ul style="list-style-type: none"> • CUYAH_000043787 • MCKPUB00006608 • MCKPUB00006609 • MCKPUB00006618
136.	Efrain Cruz	<ul style="list-style-type: none"> • CUYAH_000036390 • MCKPUB00012253 • MCKPUB00012254 • MCKPUB00012256
137.	Melvin Cruz	<ul style="list-style-type: none"> • CUYAH_000032221 • MCKPUB00018569 • MCKPUB00018570 • MCKPUB00018572
138.	Vernell Curry	<ul style="list-style-type: none"> • MCKPUB00022444
139.	Willie Curry	<ul style="list-style-type: none"> • CUYAH_000020911 • MCKPUB00022764 • MCKPUB00022765 • MCKPUB00022768
140.	Daymere Marveeouns Dabney	<ul style="list-style-type: none"> • AKRON_000201609 • MCKPUB00010331 • MCKPUB00010332 • MCKPUB00010334
141.	Michael D. "Mook" Dandridge	<ul style="list-style-type: none"> • MCKPUB00018688 • MCKPUB00018679 • MCKPUB00018704 • MCKPUB00018711 • MCKPUB00029160 • MCKPUB00029186

	Name	Sources
142.	Gregory Carnell Daniels	<ul style="list-style-type: none"> • AKRON_000201218 • MCKPUB00013670 • MCKPUB00013671 • MCKPUB00013674
143.	Steven D. Daniels	<ul style="list-style-type: none"> • MCKPUB00021143 • MCKPUB00021144 • MCKPUB00021147 • MCKPUB00021155 • MCKPUB00021157 • MCKPUB00026047 • MCKPUB00029212 • MCKPUB00029213 • MCKPUB00029214 • MCKPUB00029240 • MCKPUB00029245 • MCKPUB00029247
144.	Frederick L. Darling	<ul style="list-style-type: none"> • MCKPUB00013446 • MCKPUB00013452 • MCKPUB00013255 • MCKPUB00013469 • MCKPUB00013472 • MCKPUB00026073 • MCKPUB00026107
145.	Tevaughn Darling	<ul style="list-style-type: none"> • CUYAH_000070777 • MCKPUB00021922 • MCKPUB00021923 • MCKPUB00021930
146.	Tiree S. Davenport	<ul style="list-style-type: none"> • SUMMIT_001137532 • SUMMIT_001137540 • SUMMIT_001137541 • SUMMIT_001137610 • MCKPUB00022232 • MCKPUB00022234 • MCKPUB00022235
147.	Cortez L. Davis	<ul style="list-style-type: none"> • MCKPUB00009080 • MCKPUB00009097 • MCKPUB00009206

	Name	Sources
148.	Da'Quan Davis	<ul style="list-style-type: none"> • AKRON_000334646 • MCKPUB00026298 • MCKPUB00026299 • MCKPUB00026303 • MCKPUB00026307
149.	Devonte Deshawn Davis	<ul style="list-style-type: none"> • AKRON_000201812 • MCKPUB00010801 • MCKPUB00010802 • MCKPUB00010804
150.	Rodney Sterling Davis	<ul style="list-style-type: none"> • AKRON_000223079 • MCKPUB00020249 • MCKPUB00020251 • MCKPUB00020252
151.	Tamicka R. Davis	<ul style="list-style-type: none"> • MCKPUB00021451 • MCKPUB00021456
152.	Tedre Davis	<ul style="list-style-type: none"> • MCKPUB00021485 • MCKPUB00021487 • MCKPUB00021488 • MCKPUB00021489 • MCKPUB00021495 • MCKPUB00029249
153.	Tyrone Davis	<ul style="list-style-type: none"> • CUYAH_000081328 • MCKPUB00022410 • MCKPUB00022411 • MCKPUB00022414
154.	Marcos Dejesus	<ul style="list-style-type: none"> • CUYAH_000027860 • MCKPUB00017934 • MCKPUB00017935 • MCKPUB00017938
155.	Darwyn de la Cruz	<ul style="list-style-type: none"> • CUYAH_000032629 • MCKPUB00009911 • MCKPUB00009912 • MCKPUB00009915

	Name	Sources
156.	Zakiya Z. Delaney	<ul style="list-style-type: none"> AKRON_000213174 MCKPUB00022814 MCKPUB00022818
157.	Jacob Derrickson	<ul style="list-style-type: none"> MCKPUB00014544 MCKPUB00014735 MCKPUB00014737 MCKPUB00014748 MCKPUB00014751
158.	Luis Diaz	<ul style="list-style-type: none"> CUYAH_000037639 MCKPUB00017696 MCKPUB00017698 MCKPUB00017702
159.	Reynaldo Diaz-Guzman	<ul style="list-style-type: none"> MCKPUB00019512 MCKPUB00019514 MCKPUB00019521 MCKPUB00019529 MCKPUB00019534 MCKPUB00026501
160.	Randall Keith Dickey	<ul style="list-style-type: none"> AKRON_000207384 AKRON_001151503 MCKPUB00019379 MCKPUB00019382 MCKPUB00019383 MCKPUB00019386 MCKPUB00019388 MCKPUB00019389
161.	Danny Digregorio	<ul style="list-style-type: none"> CUYAH_000036638 MCKPUB00009524 MCKPUB00009525 MCKPUB00009527
162.	Dante D. Dixon	<ul style="list-style-type: none"> CUYAH_000056835 MCKPUB00009569 MCKPUB00009570 MCKPUB00009577

	Name	Sources
163.	Gabriel H. Dixon	<ul style="list-style-type: none"> AKRON_000288578 MCKPUB00013482 MCKPUB00013485 MCKPUB00013486
164.	Karshif A. Dobson	<ul style="list-style-type: none"> AKRON_000200975 MCKPUB00016040 MCKPUB00016041 MCKPUB00016042
165.	Antonio V. Dorman	<ul style="list-style-type: none"> MCKPUB00006999 MCKPUB00007008 MCKPUB00007010 MCKPUB00026521
166.	Larry Dorsey	<ul style="list-style-type: none"> MCKPUB00017111
167.	Larry P. Dorsey	<ul style="list-style-type: none"> AKRON_000201096 MCKPUB00017122 MCKPUB00017127 MCKPUB00017129 MCKPUB00029250
168.	Edwin Dortch, Jr.	<ul style="list-style-type: none"> MCKPUB00012180 MCKPUB00012189 MCKPUB00012196 MCKPUB00012202 MCKPUB00012204 SUMMIT_000071039
169.	Gibraun Y. Dowdell	<ul style="list-style-type: none"> AKRON_000205211 AKRON_000281110 MCKPUB00013622 MCKPUB00013625 MCKPUB00013627 MCKPUB00013628
170.	Jonathan Madison Dowdell	<ul style="list-style-type: none"> AKRON_000204332 AKRON_000287518 MCKPUB00015688 MCKPUB00015689

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00015690 • MCKPUB00015696
171.	Robert Dowdell	<ul style="list-style-type: none"> • CUYAH_000038772 • MCKPUB00019827 • MCKPUB00019829 • MCKPUB00019834
172.	Nashaun L. Drake	<ul style="list-style-type: none"> • CUYAH_000031080 • MCKPUB00019027 • MCKPUB00019028 • MCKPUB00019031
173.	Victor S. Duckworth	<ul style="list-style-type: none"> • CUYAH_000050405 • MCKPUB00022490 • MCKPUB00022491 • MCKPUB00022495
174.	Calvin L. Dudley	<ul style="list-style-type: none"> • AKRON_000288474 • AKRON_000288727 • MCKPUB00008250 • MCKPUB00008254 • MCKPUB00008255
175.	Floyd J. Dunlap, Jr.	<ul style="list-style-type: none"> • AKRON_000290464 • MCKPUB00013030 • MCKPUB00013039 • MCKPUB00013041
176.	Leron Dashawn Eady	<ul style="list-style-type: none"> • AKRON_000220815 • MCKPUB00017595 • MCKPUB00017597 • MCKPUB00017598
177.	Antonia D. Easter	<ul style="list-style-type: none"> • MCKPUB00006984 • MCKPUB00029253 • MCKPUB00029255

	Name	Sources
178.	Kevin Ecker	<ul style="list-style-type: none"> • MCKPUB00016339 • MCKPUB00016354 • MCKPUB00016356 • MCKPUB00016358 • MCKPUB00016360 • SUMMIT_000119150
179.	Mario Edmonds	<ul style="list-style-type: none"> • MCKPUB00018183 • MCKPUB00029258
180.	Melvin Edwards	<ul style="list-style-type: none"> • CUYAH_000020887 • CUYAH_000034686 • MCKPUB00018574 • MCKPUB00018575 • MCKPUB00018578
181.	Rayshawn Edwards	<ul style="list-style-type: none"> • CUYAH_000049465 • MCKPUB00019461 • MCKPUB00019462 • MCKPUB00019466
182.	Dashawn Elder	<ul style="list-style-type: none"> • MCKPUB00009937 • MCKPUB00009943 • MCKPUB00009946 • MCKPUB00009953 • MCKPUB00009960 • MCKPUB00009962 • MCKPUB00009964 • MCKPUB00009971
183.	Richard D. Ellis	<ul style="list-style-type: none"> • AKRON_000281294 • MCKPUB00019546 • MCKPUB00019548 • MCKPUB00019549
184.	Antwain Emory	<ul style="list-style-type: none"> • CUYAH_000040245 • MCKPUB00007014 • MCKPUB00007015 • MCKPUB00007020

	Name	Sources
185.	Dana M. Ervin	<ul style="list-style-type: none"> • MCKPUB00009295 • MCKPUB00009486 • MCKPUB00009488 • MCKPUB00009500 • MCKPUB00009502
186.	Antwon Evans	<ul style="list-style-type: none"> • MCKPUB00007031 • MCKPUB00007224 • MCKPUB00007235 • MCKPUB00007237 • MCKPUB00029264
187.	Aaron S. Farrey	<ul style="list-style-type: none"> • MCKPUB00006222 • MCKPUB00029266 • MCKPUB00029268
188.	Frederick Ferrell	<ul style="list-style-type: none"> • MCKPUB00013047 • MCKPUB00013238 • MCKPUB00013240 • MCKPUB00013251
189.	Deante R. Finney	<ul style="list-style-type: none"> • AKRON_001221650 • MCKPUB00026523 • MCKPUB00026526 • MCKPUB00026527
190.	Harlen T. Finney	<ul style="list-style-type: none"> • AKRON_001218583 • MCKPUB00026529 • MCKPUB00026530 • MCKPUB00026532
191.	Darelle D. Fischer	<ul style="list-style-type: none"> • AKRON_000205051 • MCKPUB00009603 • MCKPUB00009606 • MCKPUB00009607
192.	William Fitzer	<ul style="list-style-type: none"> • CUYAH_000034468 • MCKPUB00022753 • MCKPUB00022754 • MCKPUB00022757

	Name	Sources
193.	Terrance L. Fletcher	<ul style="list-style-type: none"> • MCKPUB00021607 • MCKPUB00021798 • MCKPUB00021800 • MCKPUB00021814 • MCKPUB00029271
194.	Tammi Vontella Flint	<ul style="list-style-type: none"> • AKRON_000216595 • MCKPUB00021458 • MCKPUB00021460
195.	Dierre D. Folk	<ul style="list-style-type: none"> • AKRON_000220545 • MCKPUB00010820 • MCKPUB00010822 • MCKPUB00010823
196.	Terrance L. Ford	<ul style="list-style-type: none"> • MCKPUB00021818 • MCKPUB00021819 • MCKPUB00021820 • MCKPUB00021822 • MCKPUB00021823 • MCKPUB00026535 • MCKPUB00029273
197.	James Foreman	<ul style="list-style-type: none"> • MCKPUB00015120 • MCKPUB00015121 • MCKPUB00015124 • SUMMIT_000064877
198.	Miranda B. Forsyth	<ul style="list-style-type: none"> • AKRON_001125725 • MCKPUB00026625 • MCKPUB00026629 • MCKPUB00026630
199.	Tierra Fort	<ul style="list-style-type: none"> • MCKPUB00022161 • MCKPUB00022162 • MCKPUB00022169
200.	Tommie Lee Fortson	<ul style="list-style-type: none"> • AKRON_00200617 • MCKPUB00022243 • MCKPUB00022246 • MCKPUB00022249

	Name	Sources
201.	Romando Foster	<ul style="list-style-type: none"> AKRON_000208566 MCKPUB00020513 MCKPUB00020516 MCKPUB00020517
202.	Robert L. Fowlkes, Jr.	<ul style="list-style-type: none"> MCKPUB00019965 MCKPUB00020156 MCKPUB00020162 MCKPUB00020176 MCKPUB00020178
203.	Lafayette M. Frazier	<ul style="list-style-type: none"> AKRON_000206247 MCKPUB00016880 MCKPUB00016883 MCKPUB00016884 MCKPUB00016889 MCKPUB00016891
204.	Jermaine D. Freeman	<ul style="list-style-type: none"> MCKPUB00015371 MCKPUB00029363 MCKPUB00029365
205.	Cory W. Frogge	<ul style="list-style-type: none"> AKRON_000289693 MCKPUB00009223 MCKPUB00009225 MCKPUB00009226
206.	Nathan Fryberger	<ul style="list-style-type: none"> MCKPUB00026632 MCKPUB00026633 MCKPUB00026636
207.	Brenda Frye	<ul style="list-style-type: none"> MCKPUB00007958 SUMMIT_000119174
208.	Heather Frye	<ul style="list-style-type: none"> MCKPUB00014171 SUMMIT_000119174

	Name	Sources
209.	Aaron D. Fuqua	<ul style="list-style-type: none"> • AKRON_000213383 • MCKPUB00006218 • MCKPUB00006220 • MCKPUB00006221
210.	Ernest Gaines	<ul style="list-style-type: none"> • AKRON_000204400 • MCKPUB00012782 • MCKPUB00012789 • MCKPUB00012793 • MCKPUB00012794 • MCKPUB00012801 • MCKPUB00026638 • MCKPUB00029368
211.	Terrell D. Gaiter	<ul style="list-style-type: none"> • MCKPUB00026668 • MCKPUB00026669 • AKRON_001140139 • AKRON_001140140
212.	Josean Garcia-Rivera	<ul style="list-style-type: none"> • CUYAH_000032221 • MCKPUB00015921 • MCKPUB00015922 • MCKPUB00015924
213.	Thomas Lanerr Garrett, Jr.	<ul style="list-style-type: none"> • AKRON_000201071 • MCKPUB00022151 • MCKPUB00022152 • MCKPUB00022153 • MCKPUB00022155 • MCKPUB00022157
214.	Tammie Garver	<ul style="list-style-type: none"> • CUYAH_000040397 • MCKPUB00021461 • MCKPUB00021462 • MCKPUB00021467
215.	Ryan Gaston	<ul style="list-style-type: none"> • MCKPUB00020593 • MCKPUB00020602 • MCKPUB00020604 • MCKPUB00020611 • MCKPUB00020618 • MCKPUB00026674

	Name	Sources
216.	Da'Nico D. "Dupree" Geter	<ul style="list-style-type: none"> • AKRON_000201619 • AKRON_000325481 • MCKPUB00009235 • MCKPUB00009238 • MCKPUB00009240 • MCKPUB00009241 • MCKPUB00009242 • MCKPUB00009244 • MCKPUB00009245 • MCKPUB00009246 • MCKPUB00009248 • MCKPUB00009249 • MCKPUB00009250 • MCKPUB00009252 • MCKPUB00009254 • MCKPUB00009255 • MCKPUB00009257 • MCKPUB00009262 • MCKPUB00009263 • MCKPUB00026700 • MCKPUB00029398
217.	Anthony Wayne Gibbons	<ul style="list-style-type: none"> • AKRON_001177332 • MCKPUB00026711 • MCKPUB00026712 • MCKPUB00026714
218.	Audrey Gibson	<ul style="list-style-type: none"> • MCKPUB00007510 • MCKPUB00007542 • MCKPUB00007545 • MCKPUB00007554
219.	Dontaysha Gibson	<ul style="list-style-type: none"> • MCKPUB00011520 • MCKPUB00011552 • MCKPUB00011556 • MCKPUB00011564
220.	Donte Gibson	<ul style="list-style-type: none"> • MCKPUB00011579 • MCKPUB00011611 • MCKPUB00011615 • MCKPUB00011624 • MCKPUB00029410

	Name	Sources
221.	Tyrone Gilbert	<ul style="list-style-type: none"> • CUYAH_000034353 • MCKPUB00022416 • MCKPUB00022417 • MCKPUB00022420
222.	Chaz M. Gilchrist	<ul style="list-style-type: none"> • AKRON_000200590 • MCKPUB00008915 • MCKPUB00008918 • MCKPUB00008922
223.	Matthew G.F. Gisentaner	<ul style="list-style-type: none"> • AKRON_000330911 • MCKPUB00018310 • MCKPUB00018313 • MCKPUB00018314
224.	Christopher Glatzer	<ul style="list-style-type: none"> • MCKPUB00008973 • MCKPUB00008975 • MCKPUB00008977
225.	Maurice Golston	<ul style="list-style-type: none"> • MCKPUB00018533 • MCKPUB00018539 • MCKPUB00018342 • MCKPUB00018553 • MCKPUB00018556
226.	Barbra Gonzales	<ul style="list-style-type: none"> • CUYAH_000035145 • MCKPUB00007571 • MCKPUB00007572 • MCKPUB00007574
227.	Jeronimo Gonzalez	<ul style="list-style-type: none"> • CUYAH_000036277 • MCKPUB00015594 • MCKPUB00015595 • MCKPUB00015597
228.	D'Angelo A. Gordon	<ul style="list-style-type: none"> • CUYAH_000077963 • MCKPUB00009506 • MCKPUB00009507 • MCKPUB00009509

	Name	Sources
229.	Leonard Graceffo	<ul style="list-style-type: none"> • CUYAH_000040609 • MCKPUB00017590 • MCKPUB00017591 • MCKPUB00017593
230.	Christopher Graham, Jr.	<ul style="list-style-type: none"> • CUYAH_000074377 • MCKPUB00008978 • MCKPUB00008980 • MCKPUB00008991
231.	Bryant Grant	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00008242 • MCKPUB00008245 • MCKPUB00008246 • MCKPUB00008249
232.	Dyshawn D. Gray	<ul style="list-style-type: none"> • AKRON_000286843 • MCKPUB00011882 • MCKPUB00011883 • MCKPUB00011885 • MCKPUB00011886
233.	Jermaine D. Grayson	<ul style="list-style-type: none"> • MCKPUB00015375 • MCKPUB00015566 • MCKPUB00015568 • MCKPUB00015580 • MCKPUB00015583 • MCKPUB00029454
234.	Hamilton Greathouse	<ul style="list-style-type: none"> • MCKPUB00014113 • MCKPUB00014115 • MCKPUB00014116 • MCKPUB00014118 • MCKPUB00014120 • MCKPUB00014121 • MCKPUB00014123 • MCKPUB00014125 • MCKPUB00014126 • MCKPUB00014128 • MCKPUB00014130 • MCKPUB00014131 • MCKPUB00014134 • MCKPUB00014136

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00014137 • MCKPUB00014141 • MCKPUB00014147 • MCKPUB00014149 • MCKPUB00014150 • MCKPUB00014155
235.	Brian Gregory	<ul style="list-style-type: none"> • CUYAH_000038436 • MCKPUB00008177 • MCKPUB00008178 • MCKPUB00008180
236.	Brian Keith Griffin	<ul style="list-style-type: none"> • MCKPUB00008182 • MCKPUB00008184 • MCKPUB00008185 • MCKPUB00008186
237.	Duane E. Griffin	<ul style="list-style-type: none"> • AKRON_001154747 • MCKPUB00026717 • MCKPUB00026718 • MCKPUB00026720
238.	Pierce S. Griffin	<ul style="list-style-type: none"> • AKRON_001353715 • MCKPUB00026722 • MCKPUB00026723 • MCKPUB00026725
239.	David L. Grogan	<ul style="list-style-type: none"> • AKRON_000201238 • MCKPUB00010197 • MCKPUB00010198 • MCKPUB00010200
240.	Eric D. Grundy	<ul style="list-style-type: none"> • MCKPUB00012552 • MCKPUB00012558 • MCKPUB00012560 • MCKPUB00026728
241.	Nathaniel D. Grundy	<ul style="list-style-type: none"> • MCKPUB00019033 • MCKPUB00019040 • MCKPUB00026732

	Name	Sources
242.	Antonio L. Guice	<ul style="list-style-type: none"> • AKRON_000294758 • MCKPUB00006988 • MCKPUB00006990 • MCKPUB00006991
243.	Tremayne Guin	<ul style="list-style-type: none"> • CUYAH_000039813 • MCKPUB00022328 • MCKPUB00022329 • MCKPUB00022332
244.	Anthony S. Guthrie	<ul style="list-style-type: none"> • AKRON_001277621 • MCKPUB00026764 • MCKPUB00026765 • MCKPUB00026767
245.	Christopher E. Hale	<ul style="list-style-type: none"> • AKRON_000201153 • MCKPUB00008967 • MCKPUB00008968 • MCKPUB00008971 • MCKPUB00008972
246.	Charles Hall	<ul style="list-style-type: none"> • MCKPUB00008868 • MCKPUB00008869 • MCKPUB00008872
247.	Lachelle T. Hall	<ul style="list-style-type: none"> • MCKPUB00016858 • MCKPUB00016863 • MCKPUB00016667 • MCKPUB00016874 • MCKPUB00016876
248.	Bassem Hamed	<ul style="list-style-type: none"> • AKRON_001276324 • MCKPUB00026769 • MCKPUB00026770 • MCKPUB00026772
249.	Derek Hamilton	<ul style="list-style-type: none"> • MCKPUB00010446 • MCKPUB00010451 • MCKPUB00010458

	Name	Sources
250.	Gregory Hamilton	<ul style="list-style-type: none"> • MCKPUB00013675 • MCKPUB00013866 • MCKPUB00013868 • MCKPUB00013884 • MCKPUB00013886 • MCKPUB00026778
251.	Desean R. Harbin	<ul style="list-style-type: none"> • AKRON_000205083 • MCKPUB00010494 • MCKPUB00010501 • MCKPUB00010515 • MCKPUB00010518 • MCKPUB00029456 • MCKPUB00029458
252.	Keith Hardy	<ul style="list-style-type: none"> • CUYAH_000040168 • MCKPUB00016060 • MCKPUB00016061 • MCKPUB00016064
253.	Charles Harris	<ul style="list-style-type: none"> • CUYAH_000033971 • MCKPUB00008875 • MCKPUB00008877 • MCKPUB00008891
254.	Kenneth Harris	<ul style="list-style-type: none"> • MCKPUB00016072 • MCKPUB00016263 • MCKPUB00016265 • MCKPUB00016276 • MCKPUB00016278
255.	Lamar D. Harris	<ul style="list-style-type: none"> • MCKPUB00014157 • MCKPUB00014163 • MCKPUB00014167 • MCKPUB00014168
256.	Robert E. Harris	<ul style="list-style-type: none"> • AKRON_000204364 • MCKPUB00019836 • MCKPUB00019838 • MCKPUB00019839

	Name	Sources
257.	Ryland L. Harris, Jr.	<ul style="list-style-type: none"> • MCKPUB00020635 • MCKPUB00020826 • MCKPUB00020828 • MCKPUB00020830 • MCKPUB00020833 • MCKPUB00026801 • MCKPUB00026870
258.	Dante D. Harrison	<ul style="list-style-type: none"> • MCKPUB00009539 • MCKPUB00009546 • MCKPUB00009548 • MCKPUB00009567
259.	David Harsley	<ul style="list-style-type: none"> • MCKPUB00009987 • MCKPUB00010178 • MCKPUB00010180 • MCKPUB00010191 • MCKPUB00010193
260.	Erian Harwell	<ul style="list-style-type: none"> • MCKPUB00012310 • MCKPUB00012501 • MCKPUB00012503 • MCKPUB00012514 • MCKPUB00012517 • MCKPUB00026876
261.	Alyssa Hatfield	<ul style="list-style-type: none"> • MCKPUB00006545 • SUMMIT_000662148
262.	Ricardo Hawkins	<ul style="list-style-type: none"> • CUYAH_000036142 • MCKPUB00019540 • MCKPUB00019541 • MCKPUB00019544
263.	Rodney A. Haynes	<ul style="list-style-type: none"> • MCKPUB00020224 • MCKPUB00020227 • MCKPUB00020229 • MCKPUB00020231 • MCKPUB00020233 • MCKPUB00029461

	Name	Sources
264.	Ronald Lamont Haynes	<ul style="list-style-type: none"> AKRON_000210513 MCKPUB00020525 MCKPUB00020527
265.	Deadonte Haywood	<ul style="list-style-type: none"> MCKPUB00026879 MCKPUB00026883 MCKPUB00026884
266.	Jerry Lee Henderson	<ul style="list-style-type: none"> AKRON_000204531 MCKPUB00015599 MCKPUB00015601 MCKPUB00015602
267.	Kareem Hennings	<ul style="list-style-type: none"> CUYAH_000078275 MCKPUB00016025 MCKPUB00016027 MCKPUB00016030 MCKPUB00016032 MCKPUB00016034 MCKPUB00016038
268.	John Hernandez	<ul style="list-style-type: none"> CUYAH_000035494 MCKPUB00015666 MCKPUB00015668 MCKPUB00015672
269.	Jose Hernandez	<ul style="list-style-type: none"> MCKPUB00015820 MCKPUB00015903 MCKPUB00015910 MCKPUB00015919
270.	Dewitt Herring	<ul style="list-style-type: none"> AKRON_001151503 AKRON_000223279 MCKPUB00010816 MCKPUB00010818 MCKPUB00010819
271.	Nickolas Hershbach	<ul style="list-style-type: none"> CUYAH_000078008 MCKPUB00019051 MCKPUB00019052 MCKPUB00019056

	Name	Sources
272.	Carlton Higdon	<ul style="list-style-type: none"> • MCKPUB00008508 • MCKPUB00008699 • MCKPUB00008705 • MCKPUB00008718 • MCKPUB00008721
273.	Alonzo Hill	<ul style="list-style-type: none"> • MCKPUB00006504 • MCKPUB00006507 • MCKPUB00006508 • MCKPUB00006516 • MCKPUB00006518 • MCKPUB00006520 • MCKPUB00006522 • MCKPUB00006524 • MCKPUB00006526 • MCKPUB00006528 • MCKPUB00006533 • MCKPUB00026886 • MCKPUB00029462
274.	April N. Hill	<ul style="list-style-type: none"> • MCKPUB00007449 • MCKPUB00007450 • MCKPUB00007452
275.	Gene A. Hill	<ul style="list-style-type: none"> • AKRON_000207262 • MCKPUB00026893 • MCKPUB00026894 • MCKPUB00026896
276.	Lamarr D. Hill	<ul style="list-style-type: none"> • AKRON_000220740 • MCKPUB00017098 • MCKPUB00017102 • MCKPUB00017103
277.	Sean Hinkle	<ul style="list-style-type: none"> • CUYAH_000026640 • MCKPUB00020884 • MCKPUB00020887 • MCKPUB00020888

	Name	Sources
278.	Raymond B. Hinton	<ul style="list-style-type: none"> • CUYAH_000038219 • • MCKPUB00019421 • MCKPUB00029470 • MCKPUB00029472 • MCKPUB00029475
279.	Christopher J. Hitchcock	<ul style="list-style-type: none"> • AKRON_000293336 • MCKPUB00009227 • MCKPUB00009229 • MCKPUB00009231
280.	Nicole Hite	<ul style="list-style-type: none"> • CUYAH_000037028 • MCKPUB00019058 • MCKPUB00019059 • MCKPUB00019063
281.	Robert Lewis Hoard	<ul style="list-style-type: none"> • AKRON_000280650 • MCKPUB00020182 • MCKPUB00020184
282.	Willie Hodge	<ul style="list-style-type: none"> • CUYAH_000074939 • MCKPUB00022771 • MCKPUB00022772 • MCKPUB00022775
283.	Victor Hohlakis	<ul style="list-style-type: none"> • CUYAH_000052783 • MCKPUB00022459 • MCKPUB00022460 • MCKPUB00022462
284.	Marvin J. Holmes, Jr.	<ul style="list-style-type: none"> • AKRON_001279352 • MCKPUB00026898 • MCKPUB00026899 • MCKPUB00026901
285.	Zenock H. Hood	<ul style="list-style-type: none"> • AKRON_000201729 • MCKPUB00022819 • MCKPUB00022822 • MCKPUB00022823 • MCKPUB00022826

	Name	Sources
286.	Rico M. Hooks	<ul style="list-style-type: none"> AKRON_001274716 MCKPUB00026903 MCKPUB00026906 MCKPUB00026907
287.	Danielle M. Hoover	<ul style="list-style-type: none"> MCKPUB00009521 SUMMIT_001144919
288.	Torrod C. Hopson	<ul style="list-style-type: none"> AKRON_000219698 MCKPUB00022260 MCKPUB00022263 MCKPUB00022264
289.	Carlos Horton	<ul style="list-style-type: none"> CUYAH_000031349 MCKPUB00008502 MCKPUB00008503 MCKPUB00008506
290.	Christopher Howze	<ul style="list-style-type: none"> CUYAH_000076070 MCKPUB00008993 MCKPUB00008994 MCKPUB00008998
291.	Michael W. Hudson	<ul style="list-style-type: none"> CUYAH_000055327 MCKPUB00018955 MCKPUB00018957
292.	Hollis A. Huff	<ul style="list-style-type: none"> AKRON_001274277 MCKPUB00026909 MCKPUB00026910 MCKPUB00026913
293.	Imari James Hughes	<ul style="list-style-type: none"> AKRON_001272640 MCKPUB00026916 MCKPUB00026917 MCKPUB00026920
294.	Eric L. Humphrey	<ul style="list-style-type: none"> AKRON_001216210 MCKPUB00026922 MCKPUB00026923 MCKPUB00026925

	Name	Sources
295.	Carl Hundley, Jr.	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00008480 • MCKPUB00008484 • MCKPUB00008486 • MCKPUB00008489 • MCKPUB00008490 • MCKPUB00008491 • MCKPUB00008492
296.	Norman Hunter	<ul style="list-style-type: none"> • MCKPUB00019065 • MCKPUB00019068 • MCKPUB00019078 • MCKPUB00019080 • MCKPUB00026927
297.	Tedario Hunter	<ul style="list-style-type: none"> • CUYAH_000073102 • MCKPUB00021476 • MCKPUB00021477 • MCKPUB00021482
298.	Jessica Irons	<ul style="list-style-type: none"> • MCKPUB00015604 • SUMMIT_001137100
299.	Dominique Ivory	<ul style="list-style-type: none"> • MCKPUB00011260 • MCKPUB00011451 • MCKPUB00011453 • MCKPUB00011466 • MCKPUB00011469
300.	Andrew Jackson	<ul style="list-style-type: none"> • AKRON_000213174 • MCKPUB00006828 • MCKPUB00006829 • MCKPUB00006834 • MCKPUB00006835
301.	Darcell Jackson	<ul style="list-style-type: none"> • CUYAH_000038875 • MCKPUB00009588 • MCKPUB00009589 • MCKPUB00009594

	Name	Sources
302.	Marcus T. Jackson	<ul style="list-style-type: none"> • AKRON_000213986 • MCKPUB00018180 • MCKPUB00018182
303.	Sundy Jackson	<ul style="list-style-type: none"> • CUYAH_000039107 • MCKPUB00021435 • MCKPUB00021436 • MCKPUB00021439
304.	Terrell L. Jarvis	<ul style="list-style-type: none"> • AKRON_000205017 • AKRON_000295612 • MCKPUB00021855 • MCKPUB00021856 • MCKPUB00021859 • MCKPUB00021861
305.	Arthur Lee Jefferson	<ul style="list-style-type: none"> • AKRON_000201488 • MCKPUB00007474 • MCKPUB00007476 • MCKPUB00007478 • MCKPUB00007479 • MCKPUB00007480 • MCKPUB00007482 • MCKPUB00007483 • MCKPUB00007484 • MCKPUB00007491 • MCKPUB00007501
306.	Brandon M. Jefferson	<ul style="list-style-type: none"> • AKRON_001216068 • MCKPUB00026972 • MCKPUB00026973 • MCKPUB00026975
307.	Jurmaine A. Jeffries	<ul style="list-style-type: none"> • MCKPUB00015965 • MCKPUB00015967 • MCKPUB00015975 • MCKPUB00015978 • MCKPUB00016000 • MCKPUB00016002 • MCKPUB00029477 • MCKPUB00029479

	Name	Sources
308.	Edward Jewell (also known as Rayshawn Williams)	<ul style="list-style-type: none"> • MCKPUB00012142 • MCKPUB00012151 • MCKPUB00012165 • MCKPUB00026978 • MCKPUB00027016
309.	Anthony D. Johnson	<ul style="list-style-type: none"> • CUYAH_000074721 • MCKPUB00006916 • MCKPUB00006917 • MCKPUB00006920
310.	Darrell R. Johnson	<ul style="list-style-type: none"> • CUYAH_000032821 • MCKPUB00009887 • MCKPUB00009888 • MCKPUB00009891
311.	Douglas T. Johnson	<ul style="list-style-type: none"> • MCKPUB00011642 • MCKPUB00011835 • MCKPUB00011833 • MCKPUB00011838 • MCKPUB00011840
312.	Dwayne A. Johnson	<ul style="list-style-type: none"> • AKRON_000200740 • MCKPUB00011866 • MCKPUB00011868 • MCKPUB00011869 • MCKPUB00011871
313.	Jarmarcus M. Johnson	<ul style="list-style-type: none"> • AKRON_000220638 • MCKPUB00015351 • MCKPUB00015354
314.	Joe Johnson	<ul style="list-style-type: none"> • CUYAH_000028411 • CUYAH_014632182 • MCKPUB00015631 • MCKPUB00015633 • MCKPUB00015638 • MCKPUB00029483
315.	Kevin D. Johnson	<ul style="list-style-type: none"> • AKRON_000294846 • MCKPUB00016333 • MCKPUB00016334 • MCKPUB00016336

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00016338
316.	Lamont Johnson	<ul style="list-style-type: none"> • CUYAH_000033188 • MCKPUB00017104 • MCKPUB00017105 • MCKPUB00017106
317.	Luther B. Johnson	<ul style="list-style-type: none"> • MCKPUB00017704 • MCKPUB00017895 • MCKPUB00017897 • MCKPUB00017909 • MCKPUB00017911
318.	Paul Jewel Johnson	<ul style="list-style-type: none"> • MCKPUB00027106 • MCKPUB00027107 • MCKPUB00027110
319.	Robert J. Johnson	<ul style="list-style-type: none"> • MCKPUB00019840 • MCKPUB00019843 • MCKPUB00019946 • MCKPUB00019953 • MCKPUB00019963 • MCKPUB00027113
320.	Ronnie L. Johnson, Jr.	<ul style="list-style-type: none"> • CUYAH_000032762 • MCKPUB00020558 • MCKPUB00020560 • MCKPUB00020563
321.	William Johnson	<ul style="list-style-type: none"> • CUYAH_000033757 • MCKPUB00022759 • MCKPUB00022760 • MCKPUB00022762
322.	Willie Jerome Johnson	<ul style="list-style-type: none"> • AKRON_000206610 • MCKPUB00027316 • MCKPUB00027317 • MCKPUB00027319

	Name	Sources
323.	Darnell A. Jones	<ul style="list-style-type: none"> AKRON_001217598 MCKPUB00027322 MCKPUB00027323 MCKPUB00027325
324.	Darrone D. Jones	<ul style="list-style-type: none"> AKRON_001157235 MCKPUB00027327 MCKPUB00027329 MCKPUB00027330 SUMMIT_000405599
325.	Jerry D. Jones	<ul style="list-style-type: none"> AKRON_001175708 MCKPUB00027333 MCKPUB00027334 MCKPUB00027336
326.	Laurie D. Jones	<ul style="list-style-type: none"> CUYAH_000070777 MCKPUB00017347 MCKPUB00017348 MCKPUB00017350
327.	Michael L. Jones	<ul style="list-style-type: none"> MCKPUB00018924 MCKPUB00018926 MCKPUB00018733 MCKPUB00018937 MCKPUB00018939
328.	Rafael Jones	<ul style="list-style-type: none"> MCKPUB00019352 MCKPUB00019353 MCKPUB00019355 MCKPUB00019358 MCKPUB00019360 MCKPUB00019369
329.	Reginald L. Jones	<ul style="list-style-type: none"> AKRON_001216398 MCKPUB00027339 MCKPUB00027340 MCKPUB00027344
330.	Shatosha Ugaunda Jones	<ul style="list-style-type: none"> AKRON_001157034 MCKPUB00027348 MCKPUB00027349 MCKPUB00027351

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00027353 • MCKPUB00027354 • MCKPUB00027357
331.	Tion D. Jones	<ul style="list-style-type: none"> • MCKPUB00027360 • MCKPUB00027361 • MCKPUB00027363
332.	William Jones	<ul style="list-style-type: none"> • CUYAH_000037739 • MCKPUB00022728 • MCKPUB00022729 • MCKPUB00022731
333.	Gerardo Juarez	<ul style="list-style-type: none"> • CUYAH_000043787 • MCKPUB00013586 • MCKPUB00013587 • MCKPUB00013590
334.	Carter A. Juhard	<ul style="list-style-type: none"> • AKRON_001157288 • MCKPUB00027365 • MCKPUB00027366 • MCKPUB00027368
335.	David M. Justice	<ul style="list-style-type: none"> • AKRON_000212940 • MCKPUB00010211 • MCKPUB00010214 • MCKPUB00010215
336.	Valerie Karosy	<ul style="list-style-type: none"> • CUYAH_000028012 • MCKPUB00022428 • MCKPUB00022429 • MCKPUB00022431
337.	Brandon L. Kelly	<ul style="list-style-type: none"> • MCKPUB00007664 • MCKPUB00027371 • SUMMIT_001136501
338.	Richard Kessler	<ul style="list-style-type: none"> • CUYAH_000033669 • MCKPUB00019550 • MCKPUB00019551 • MCKPUB00019556

	Name	Sources
339.	Jesse Kinder	<ul style="list-style-type: none"> • MCKPUB00027381 • MCKPUB00027382 • MCKPUB00027384
340.	Angela L. King	<ul style="list-style-type: none"> • AKRON_000214143 • MCKPUB00006860 • MCKPUB00006863 • MCKPUB00006864 • MCKPUB00006867 • SUMMIT_000064886 • SUMMIT_000704436 • SUMMIT_000704475 • SUMMIT_000704477 • SUMMIT_001517361
341.	Earl King	<ul style="list-style-type: none"> • CUYAH_000035688 • MCKPUB00011887 • MCKPUB00011888 • MCKPUB00011890
342.	Kashrail Mark King	<ul style="list-style-type: none"> • AKRON_000210996 • AKRON_000214324 • MCKPUB00016043 • MCKPUB00016045 • MCKPUB00016046 • MCKPUB00016049
343.	Michaelas F. King	<ul style="list-style-type: none"> • MCKPUB00018971 • MCKPUB00029486 • MCKPUB00029488
344.	Henry Knight III	<ul style="list-style-type: none"> • AKRON_000204842 • MCKPUB00014172 • MCKPUB00014175 • MCKPUB00014177 • MCKPUB00014178
345.	Barry Kobzowicz	<ul style="list-style-type: none"> • CUYAH_000037224 • MCKPUB00007576 • MCKPUB00007577 • MCKPUB00007579

	Name	Sources
346.	Arthur Lee Kubalek	<ul style="list-style-type: none"> • AKRON_000200965 • MCKPUB00007469 • MCKPUB00007472 • MCKPUB00007473
347.	Bonnie L. Lambert	<ul style="list-style-type: none"> • AKRON_000205017 • AKRON_000295612 • MCKPUB00007649 • MCKPUB00007652 • MCKPUB00007653 • MCKPUB00007654 • MCKPUB00007656 • MCKPUB00007657 • MCKPUB00007658 • MCKPUB00007660 • MCKPUB00007661
348.	Scott Layne	<ul style="list-style-type: none"> • AKRON_0002086666 • MCKPUB00020878 • MCKPUB00020880
349.	Lorenzo Leatherwood	<ul style="list-style-type: none"> • AKRON_000208683 • AKRON_000208702 • MCKPUB00017682 • MCKPUB00017684 • MCKPUB00017685 • MCKPUB00017686
350.	Cy L. Lee	<ul style="list-style-type: none"> • AKRON_000280536 • AKRON_001289269 • MCKPUB00009231 • MCKPUB00009233 • MCKPUB00009234
351.	Kenneth M. Leland	<ul style="list-style-type: none"> • AKRON_000220862 • MCKPUB00016282 • MCKPUB00016285 • MCKPUB00016286

	Name	Sources
352.	Darrell Lempeck	<ul style="list-style-type: none"> • CUYAH_000048640 • MCKPUB00009835 • MCKPUB00009836 • MCKPUB00009841
353.	Ben Lenoir, Jr.	<ul style="list-style-type: none"> • CUYAH_000054223 • MCKPUB00007581 • MCKPUB00007582 • MCKPUB00007586
354.	Michael D. Lenoir	<ul style="list-style-type: none"> • AKRON_001125497 • MCKPUB00027386 • MCKPUB00027389 • MCKPUB00027390
355.	Justin P. Lewis	<ul style="list-style-type: none"> • CUYAH_000078572 • MCKPUB00003296 • MCKPUB00003297 • MCKPUB00003304
356.	Robert Lee Lewis	<ul style="list-style-type: none"> • CUYAH_000033806 • CUYAH_000034553 • MCKPUB00020192 • MCKPUB00020193 • MCKPUB00020195 • MCKPUB00020197 • MCKPUB00020198 • MCKPUB00020201
357.	Maurice D. Lightner	<ul style="list-style-type: none"> • CUYAH_000072865 • MCKPUB00018328 • MCKPUB00018329 • MCKPUB00018331
358.	John E. Little	<ul style="list-style-type: none"> • AKRON_000288460 • MCKPUB00015655 • MCKPUB00015658 • MCKPUB00015659
359.	William A. Little	<ul style="list-style-type: none"> • AKRON_000288474 • AKRON_000288727 • MCKPUB00022739 • MCKPUB00022741

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00022742
360.	Armando Lopez-Diaz	<ul style="list-style-type: none"> • CUYAH_000034648 • MCKPUB00007462 • MCKPUB00007464 • MCKPUB00007467
361.	Michael Jackson Love	<ul style="list-style-type: none"> • AKRON_000206089 • AKRON_000214324 • MCKPUB00018725 • MCKPUB00018727 • MCKPUB00018728 • MCKPUB00018730 • MCKPUB00018732
362.	Andrew Loving	<ul style="list-style-type: none"> • MCKPUB00006620 • MCKPUB00006811 • MCKPUB00006813 • MCKPUB00006824 • MCKPUB00027392 • MCKPUB00029491
363.	Richard Lowe	<ul style="list-style-type: none"> • CUYAH_000035982 • MCKPUB00019559 • MCKPUB00019560 • MCKPUB00019565
364.	Alfonso D. Lujan	<ul style="list-style-type: none"> • AKRON_000207295 • AKRON_001151503 • MCKPUB00006302 • MCKPUB00006303 • MCKPUB00006305 • MCKPUB00006306 • MCKPUB00006307 • MCKPUB00006309 • MCKPUB00006312 • MCKPUB00006313 • MCKPUB00006314 • MCKPUB00006316

	Name	Sources
365.	Marchello D. Lumbus	<ul style="list-style-type: none"> • CUYAH_000028012 • MCKPUB00017929 • MCKPUB00017930 • MCKPUB00017932
366.	Jeffery W. Lusher	<ul style="list-style-type: none"> • AKRON_001151032 • MCKPUB00027429 • MCKPUB00027432 • MCKPUB00027433
367.	Anthony Mack	<ul style="list-style-type: none"> • CUYAH_000040397 • MCKPUB00006926 • MCKPUB00006928 • MCKPUB00006932
368.	Reginald Madgett	<ul style="list-style-type: none"> • CUYAH_000033073 • MCKPUB00019473 • MCKPUB00019474 • MCKPUB00019477
369.	Don A. Maigari	<ul style="list-style-type: none"> • AKRON_000206429 • MCKPUB00011473 • MCKPUB00011474 • MCKPUB00011483 • MCKPUB00011490 • MCKPUB00011491 • MCKPUB00011498 • MCKPUB00011499 • MCKPUB00011506 • MCKPUB00011509 • MCKPUB00011511 • MCKPUB00011514 • MCKPUB00011515 • MCKPUB00011516 • MCKPUB00011518
370.	Aris Lamont Mann	<ul style="list-style-type: none"> • AKRON_000206007 • AKRON_000294658 • MCKPUB00007453 • MCKPUB00007457 • MCKPUB00007460 • MCKPUB00007461

	Name	Sources
371.	Charles Marotto	<ul style="list-style-type: none"> • MCKPUB00008887 • SUMMIT_001439258
372.	Rafael Matos Marrero, Jr.	<ul style="list-style-type: none"> • CUYAH_000037120 • MCKPUB00019371 • MCKPUB00019373 • MCKPUB00019376
373.	Jameire A. Marrow	<ul style="list-style-type: none"> • AKRON_000205533 • AKRON_000222486 • AKRON_000292910 • MCKPUB00014981 • MCKPUB00014984 • MCKPUB00014985
374.	Audrey J. Martin	<ul style="list-style-type: none"> • AKRON_000205362 • MCKPUB00007556 • MCKPUB00007561 • MCKPUB00007562 • MCKPUB00007563
375.	Gino Martin	<ul style="list-style-type: none"> • MCKPUB00013638 • MCKPUB00013641 • MCKPUB00013643 • MCKPUB00013645 • MCKPUB00013649 • MCKPUB00013653 • MCKPUB00013655 • MCKPUB00013659 • MCKPUB00013651
376.	Matthew Martin	<ul style="list-style-type: none"> • MCKPUB00018315 • MCKPUB00018318 • MCKPUB00018319 • MCKPUB00018325
377.	Angel Martinez	<ul style="list-style-type: none"> • CUYAH_000039086 • MCKPUB00006846 • MCKPUB00006847 • MCKPUB00006850

	Name	Sources
378.	Pedro Martinez	<ul style="list-style-type: none"> • CUYAH_000036231 • MCKPUB00019261 • MCKPUB00019263 • MCKPUB00019265
379.	Darrell Massingille	<ul style="list-style-type: none"> • MCKPUB00009843 • MCKPUB00009861 • MCKPUB00009869 • MCKPUB00009877 • MCKPUB00009879 • MCKPUB00009881 • MCKPUB00027435
380.	Gary J. Mathews	<ul style="list-style-type: none"> • AKRON_000337585 • MCKPUB00013529 • MCKPUB00013532 • MCKPUB00013533 • MCKPUB00029493 • SUMMIT_001142917
381.	Mario Mattox	<ul style="list-style-type: none"> • MCKPUB00018185 • MCKPUB00018187 • MCKPUB00018189 • MCKPUB00018197 • MCKPUB00018202
382.	Devonta Maxwell	<ul style="list-style-type: none"> • MCKPUB00010590 • MCKPUB00010797
383.	Darryl Mayes	<ul style="list-style-type: none"> • CUYAH_000032902 • MCKPUB00009893 • MCKPUB00009894 • MCKPUB00009897
384.	Michael A. McCalister	<ul style="list-style-type: none"> • AKRON_001281013 • MCKPUB00027506 • MCKPUB00027507 • MCKPUB00027509

	Name	Sources
385.	Dave McCall	<ul style="list-style-type: none"> • CUYAH_000032673 • MCKPUB00009973 • MCKPUB00009974 • MCKPUB00009976
386.	Terrance Norman-Devin McCormick	<ul style="list-style-type: none"> • AKRON_000204706 • MCKPUB00021828 • MCKPUB00021830 • MCKPUB00021831 • MCKPUB00021836 • MCKPUB00021838
387.	Shawn Christopher McCoy	<ul style="list-style-type: none"> • AKRON_001216104 • MCKPUB00027511 • MCKPUB00027512 • MCKPUB00027515
388.	Dejuan B. McCraney	<ul style="list-style-type: none"> • AKRON_001279435 • MCKPUB00027519 • MCKPUB00027520 • MCKPUB00027523
389.	Thomas McCully	<ul style="list-style-type: none"> • MCKPUB00021937 • MCKPUB00022128 • MCKPUB00022134 • MCKPUB00022145 • MCKPUB00022147 • MCKPUB00027527
390.	Otis J. McDay	<ul style="list-style-type: none"> • AKRON_000213404 • AKRON_001289828 • MCKPUB00019244 • MCKPUB00019245 • MCKPUB00019248
391.	Anthony Ray McGowan	<ul style="list-style-type: none"> • AKRON_000296482 • MCKPUB00006935 • MCKPUB00006938 • MCKPUB00006939

	Name	Sources
392.	Jonathan E. McGrady	<ul style="list-style-type: none"> AKRON_000291078 MCKPUB00015684 MCKPUB00015686 MCKPUB00015687
393.	Tavares Jarod McIntosh	<ul style="list-style-type: none"> MCKPUB00021470 MCKPUB00021472
394.	Thessalonians McMillan, Jr.	<ul style="list-style-type: none"> AKRON_000286863 AKRON_001287618 MCKPUB00021912 MCKPUB00021914 MCKPUB00021915
395.	Tramontay D. McWain	<ul style="list-style-type: none"> MCKPUB00022271 MCKPUB00022282 MCKPUB00022284
396.	Cedric Means	<ul style="list-style-type: none"> CUYAH_000036934 MCKPUB00008750 MCKPUB00008751 MCKPUB00008754
397.	Alyssa N. Mears	<ul style="list-style-type: none"> AKRON_000218494 MCKPUB00006548 MCKPUB00006550 MCKPUB00006551 SUMMIT_000672205 SUMMIT_000672222 SUMMIT_000672225
398.	Terron Lamar Melton	<ul style="list-style-type: none"> AKRON_001153878 MCKPUB00025831 MCKPUB00025832 MCKPUB00025834
399.	Edison Mercado	<ul style="list-style-type: none"> CUYAH_000047308 MCKPUB00011915 MCKPUB00011916 MCKPUB00011920

	Name	Sources
400.	Kenneth Lamar Merritt	<ul style="list-style-type: none"> • AKRON_000200558 • MCKPUB00018581 • MCKPUB00018582 • MCKPUB00018585 • MCKPUB00018587 • MCKPUB00018588 • MCKPUB00018590 • MCKPUB00018593 • MCKPUB00018594 • MCKPUB00018595 • MCKPUB00018597 • MCKPUB00018599 • MCKPUB00018601 • MCKPUB00018603 • MCKPUB00018607 • MCKPUB00018608 • MCKPUB00018609
401.	Jimmy L. Michaels	<ul style="list-style-type: none"> • AKRON_000208532 • MCKPUB00015610 • MCKPUB00015613 • MCKPUB00015614
402.	Robvedo J. Middlebrook	<ul style="list-style-type: none"> • CUYAH_000029247 • MCKPUB00020212 • MCKPUB00020213 • MCKPUB00020216
403.	Lamar Middleton	<ul style="list-style-type: none"> • MCKPUB00016898 • MCKPUB00017089 • MCKPUB00017091 • MCKPUB00017094 • MCKPUB00029494
404.	Eugene Miller	<ul style="list-style-type: none"> • MCKPUB00012807 • MCKPUB00012998 • MCKPUB00013004 • MCKPUB00013016 • MCKPUB00013018

	Name	Sources
405.	Edward Mitchell	<ul style="list-style-type: none"> • CUYAH_000074070 • MCKPUB00012168 • MCKPUB00012170 • MCKPUB00012173
406.	Gabrielle M. Moneypenny	<ul style="list-style-type: none"> • AKRON_000201579 • MCKPUB00013487 • MCKPUB00013488 • MCKPUB00013491 • MCKPUB00013493 • MCKPUB00013496 • MCKPUB00013497 • MCKPUB00013498 • MCKPUB00013501 • MCKPUB00013503 • MCKPUB00013505
407.	Rayshawn A. Montgomery	<ul style="list-style-type: none"> • AKRON_000201807 • MCKPUB00019456 • MCKPUB00019459 • MCKPUB00019460
408.	Christopher Moore	<ul style="list-style-type: none"> • CUYAH_000074721 • MCKPUB00009008 • MCKPUB00009009 • MCKPUB00009012
409.	Ernest W. Moore	<ul style="list-style-type: none"> • AKRON_000218427 • MCKPUB00012803 • MCKPUB00012805 • MCKPUB00012806
410.	Kevin D. Moore	<ul style="list-style-type: none"> • AKRON_000205310 • MCKPUB00016326 • MCKPUB00016328 • MCKPUB00016329 • MCKPUB00016330
411.	Larry L. Moore, III	<ul style="list-style-type: none"> • AKRON_000287003 • MCKPUB00017113 • MCKPUB00017114 • MCKPUB00017117 • MCKPUB00017118

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		<ul style="list-style-type: none"> • MCKPUB00029541 • MCKPUB00029542 • SUMMIT_001144901
412.	Maceo Moore	<ul style="list-style-type: none"> • MCKPUB00017915 • MCKPUB00017918
413.	Shatoria Moore	<ul style="list-style-type: none"> • AKRON_000205355 • MCKPUB00020908 • MCKPUB00020911 • MCKPUB00020912
414.	Timothy DJ Moore	<ul style="list-style-type: none"> • AKRON_000205355 • MCKPUB00022186 • MCKPUB00022192 • MCKPUB00022194 • MCKPUB00022200 • MCKPUB00022208
415.	Rashawn Moorer	<ul style="list-style-type: none"> • AKRON_000205747 • AKRON_000286790 • MCKPUB00019407 • MCKPUB00019409 • MCKPUB00019410
416.	Victor Morales-Garcia	<ul style="list-style-type: none"> • MCKPUB00022464 • MCKPUB00022472 • MCKPUB00022479 • MCKPUB00022480 • MCKPUB00022487 • MCKPUB00029544
417.	Ricky Moreland	<ul style="list-style-type: none"> • CUYAH_000038718 • MCKPUB00019593 • MCKPUB00019594 • MCKPUB00019597
418.	Dontez L. Morgan	<ul style="list-style-type: none"> • CUYAH_000077258 • MCKPUB00011626 • MCKPUB00011627 • MCKPUB00011631

	Name	Sources
419.	Eddie Morgan III	<ul style="list-style-type: none"> • AKRON_000205421 • MCKPUB00011892 • MCKPUB00011894 • MCKPUB00011895 • MCKPUB00011896
420.	Jack Morgan	<ul style="list-style-type: none"> • MCKPUB00014498 • MCKPUB00014516 • MCKPUB00014517 • MCKPUB00014525 • MCKPUB00014527 • MCKPUB00014529
421.	Marcus Morgan	<ul style="list-style-type: none"> • CUYAH_000048180 • CUYAH_000051048 • MCKPUB00018174 • MCKPUB00018175 • MCKPUB00018178
422.	Vince Morgan	<ul style="list-style-type: none"> • MCKPUB00022497 • MCKPUB00022688 • MCKPUB00022694 • MCKPUB00022707 • MCKPUB00022710
423.	Marcus Labrone Morris	<ul style="list-style-type: none"> • MCKPUB00018153 • MCKPUB00018156 • MCKPUB00018163 • MCKPUB00018170 • MCKPUB00018172
424.	Jordan Motley	<ul style="list-style-type: none"> • AKRON_001218169 • MCKPUB00027570 • MCKPUB00027571 • MCKPUB00027574
425.	Homer Moton	<ul style="list-style-type: none"> • CUYAH_000033602 • MCKPUB00014179 • MCKPUB00014180 • MCKPUB00014183

	Name	Sources
426.	Tazae Rasheed Muhammad	<ul style="list-style-type: none"> AKRON_000280536 MCKPUB00021473 MCKPUB00021475
427.	Edward Munoz	<ul style="list-style-type: none"> CUYAH_000032859 MCKPUB00012175 MCKPUB00012176 MCKPUB00012178
428.	Sherman C. Murdock	<ul style="list-style-type: none"> AKRON_000205576 MCKPUB00021125 MCKPUB00021128 MCKPUB00021129
429.	Jerome L. Murphy, Jr.	<ul style="list-style-type: none"> AKRON_001272640 MCKPUB00027576 MCKPUB00027577 MCKPUB00027580
430.	Mohanad Y. Najjar	<ul style="list-style-type: none"> CUYAH_000034507 MCKPUB00018992 MCKPUB00018993 MCKPUB00018995
431.	Fred Nakagawa	<ul style="list-style-type: none"> CUYAH_000032780 MCKPUB00013042 MCKPUB00013043 MCKPUB00013045
432.	Benjamin T. Napier	<ul style="list-style-type: none"> AKRON_000204238 MCKPUB00007610 MCKPUB00007612 MCKPUB00007613
433.	Van Dyke Neal	<ul style="list-style-type: none"> CUYAH_000040218 MCKPUB00022438 MCKPUB00022439 MCKPUB00022442
434.	Charles W. Nelson	<ul style="list-style-type: none"> CUYAH_000077080 MCKPUB00008890 MCKPUB00008891

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		<ul style="list-style-type: none"> • MCKPUB00008899
435.	Emmett Nelson	<ul style="list-style-type: none"> • MCKPUB00012295 • MCKPUB00012297 • MCKPUB00012299 • MCKPUB00012306 • MCKPUB00012308 • MCKPUB00029546
436.	Calvin Nettles	<ul style="list-style-type: none"> • CUYAH_000030470 • MCKPUB00008256 • MCKPUB00008258 • MCKPUB00008262
437.	Brian K. Newell	<ul style="list-style-type: none"> • AKRON_000220615 • AKRON_000220617 • AKRON_001151503 • MCKPUB00008212 • MCKPUB00008215 • MCKPUB00008216 • MCKPUB00008217 • MCKPUB00008222 • MCKPUB00008223
438.	Angel Nieves	<ul style="list-style-type: none"> • CUYAH_000034094 • MCKPUB00006852 • MCKPUB00006853 • MCKPUB00006858
439.	Edward F. Nix	<ul style="list-style-type: none"> • MCKPUB00011922 • MCKPUB00012113 • MCKPUB00012115 • MCKPUB00012133 • MCKPUB00012130 • MCKPUB00029562
440.	Brenda H. Norman	<ul style="list-style-type: none"> • MCKPUB00007947 • MCKPUB00007959 • MCKPUB00008150 • MCKPUB00008156 • MCKPUB00008169

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		<ul style="list-style-type: none"> • MCKPUB00029573
441.	Antwone Nowden	<ul style="list-style-type: none"> • MCKPUB00007241 • MCKPUB00007237 • MCKPUB00007432 • MCKPUB00007434 • MCKPUB00007447 • MCKPUB00029606
442.	Octavious Odom	<ul style="list-style-type: none"> • CUYAH_000029454 • MCKPUB00019212 • MCKPUB00019213 • MCKPUB00019218
443.	Dalvyn R. Oliver	<ul style="list-style-type: none"> • AKRON_000292867 • MCKPUB00009270 • MCKPUB00009272 • MCKPUB00009273
444.	Deshawn Leon Oliver	<ul style="list-style-type: none"> • AKRON_000201422 • AKRON_000220451 • MCKPUB00010525 • MCKPUB00010526 • MCKPUB00010528 • MCKPUB00010529 • MCKPUB00010531 • MCKPUB00010532 • MCKPUB00010533 • MCKPUB00010535 • MCKPUB00010536
445.	Emilia Orengo	<ul style="list-style-type: none"> • CUYAH_000036390 • MCKPUB00012289 • MCKPUB00012291 • MCKPUB00012293
446.	Catherine Orges	<ul style="list-style-type: none"> • CUYAH_000032679 • MCKPUB00008739 • MCKPUB00008740 • MCKPUB00008742 • MCKPUB00008745

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00008746 • MCKPUB00008748
447.	David Orges	<ul style="list-style-type: none"> • CUYAH_000032679 • MCKPUB00010216 • MCKPUB00010217 • MCKPUB00010220 • MCKPUB00010223 • MCKPUB00010224 • MCKPUB00010226
448.	Pedro Ortega-Gomez	<ul style="list-style-type: none"> • MCKPUB00019267 • MCKPUB00019275 • MCKPUB00019277 • MCKPUB00019286 • MCKPUB00019288 • MCKPUB00019289
449.	Raphael Ortiz	<ul style="list-style-type: none"> • CUYAH_000036277 • MCKPUB00019396 • MCKPUB00019397 • MCKPUB00019401
450.	Charles K. Osei	<ul style="list-style-type: none"> • AKRON_000211552 • MCKPUB00008883 • MCKPUB00008885 • MCKPUB00008886
451.	Juan A. Otero	<ul style="list-style-type: none"> • AKRON_001281635 • MCKPUB00027582 • MCKPUB00027586 • MCKPUB00027587
452.	Frederick Thomas Owens	<ul style="list-style-type: none"> • MCKPUB00027589 • MCKPUB00027590 • MCKPUB00027592
453.	Kamilah Owens	<ul style="list-style-type: none"> • CUYAH_000074070 • MCKPUB00016019 • MCKPUB00016020 • MCKPUB00016023

	Name	Sources
454.	Renardo Owens, Jr.	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00019500 • MCKPUB00019503 • MCKPUB00019506 • MCKPUB00019507 • MCKPUB00019510 • MCKPUB00019511
455.	Alicia Paradise	<ul style="list-style-type: none"> • CUYAH_000038326 • MCKPUB00006461 • MCKPUB00006462 • MCKPUB00006466
456.	Robert K. Parham	<ul style="list-style-type: none"> • AKRON_001279098 • MCKPUB00027594 • MCKPUB00027595 • MCKPUB00027600
457.	Darryl D. Pariseau	<ul style="list-style-type: none"> • CUYAH_000075602 • MCKPUB00009900 • MCKPUB00009901 • MCKPUB00009904
458.	Alan S. Parker	<ul style="list-style-type: none"> • CUYAH_000067017 • MCKPUB00006277 • MCKPUB00006279 • MCKPUB00006282
459.	Brandon Parker	<ul style="list-style-type: none"> • MCKPUB00007675 • MCKPUB00007678 • MCKPUB00007686 • MCKPUB00007687 • MCKPUB00007690 • MCKPUB00007692 • MCKPUB00007699
460.	Demetrius L. Parker II	<ul style="list-style-type: none"> • AKRON_001237583 • MCKPUB00027605 • MCKPUB00027607 • MCKPUB00027608 • MCKPUB00027611 • MCKPUB00027612

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		<ul style="list-style-type: none"> • SUMMIT_000575887
461.	Brandon M. Payne	<ul style="list-style-type: none"> • AKRON_000280791 • MCKPUB00007665 • MCKPUB00007667 • MCKPUB00007668
462.	Dominic J. Pelle	<ul style="list-style-type: none"> • MCKPUB00011049 • SUMMIT_001140603
463.	Ivan Percy	<ul style="list-style-type: none"> • MCKPUB00014471 • MCKPUB00014473 • MCKPUB00014280 • MCKPUB00014487 • MCKPUB00014490 • MCKPUB00029638
464.	Edwin Perez	<ul style="list-style-type: none"> • CUYAH_000034067 • MCKPUB00012211 • MCKPUB00012213 • MCKPUB00012217
465.	Andre Person	<ul style="list-style-type: none"> • CUYAH_000079198 • MCKPUB00006580 • MCKPUB00006581 • MCKPUB00006585
466.	Antoine Petty	<ul style="list-style-type: none"> • AKRON_000203447 • MCKPUB00027615 • MCKPUB00027620 • MCKPUB00027621
467.	Antoine Phelps	<ul style="list-style-type: none"> • AKRON_001211268 • MCKPUB00027623 • MCKPUB00027624 • MCKPUB00027627

	Name	Sources
468.	Garland V. Phelps, Jr.	<ul style="list-style-type: none"> • MCKPUB00013521 • MCKPUB00029664 • MCKPUB00029666
469.	Ronald L. Phelps	<ul style="list-style-type: none"> • AKRON_00200682 • MCKPUB00020544 • MCKPUB00020546 • MCKPUB00020547
470.	Rodrick Phillips	<ul style="list-style-type: none"> • CUYAH_000079198 • MCKPUB00020258 • MCKPUB00020259 • MCKPUB00020262
471.	Anton R. Picket	<ul style="list-style-type: none"> • CUYAH_000079198 • MCKPUB00029669 • MCKPUB00029671 • MCKPUB00029676
472.	Richard Pinson	<ul style="list-style-type: none"> • CUYAH_000033149 • MCKPUB00019568 • MCKPUB00019569 • MCKPUB00019572
473.	Jason L. Pitts	<ul style="list-style-type: none"> • AKRON_000201686 • MCKPUB00015355 • MCKPUB00015357 • MCKPUB00015358 • MCKPUB00015359 • MCKPUB00015361 • MCKPUB00015363 • MCKPUB00015364 • MCKPUB00015365
474.	Corey Pope	<ul style="list-style-type: none"> • CUYAH_000036102 • MCKPUB00009064 • MCKPUB00009066 • MCKPUB00009071 • MCKPUB00009073 • MCKPUB00009075 • MCKPUB00009078

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475.	James M. Porter	<ul style="list-style-type: none"> • MCKPUB00013521 • MCKPUB00029678 • MCKPUB00029680
476.	Deangelo R. Portis	<ul style="list-style-type: none"> • AKRON_001215997 • MCKPUB00027629 • MCKPUB00027633 • MCKPUB00027634
477.	Lakisha L. Portis	<ul style="list-style-type: none"> • AKRON_000201322 • MCKPUB00016892 • MCKPUB00016894 • MCKPUB00016895 • MCKPUB00016897
478.	Eric Powell	<ul style="list-style-type: none"> • MCKPUB00012560 • MCKPUB00012771 • MCKPUB00012751 • MCKPUB00012754 • MCKPUB00012774 • MCKPUB00029683
479.	Kevin K. Preston	<ul style="list-style-type: none"> • AKRON_000200803 • AKRON_000280929 • MCKPUB00016362 • MCKPUB00016363 • MCKPUB00016365 • MCKPUB00016581 • MCKPUB00016584
480.	Mark Price	<ul style="list-style-type: none"> • CUYAH_000031402 • MCKPUB00018242 • MCKPUB00018243 • MCKPUB00018256
481.	Allen J. Quarterman	<ul style="list-style-type: none"> • AKRON_000218157 • AKRON_000283208 • MCKPUB00006468 • MCKPUB00006471 • MCKPUB00006472 • MCKPUB00006473 • MCKPUB00006475

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		<ul style="list-style-type: none"> • MCKPUB00006476
482.	Edgar R. Quiles	<ul style="list-style-type: none"> • CUYAH_000052764 • MCKPUB00011899 • MCKPUB00011901 • MCKPUB00011906
483.	Ruben Lopez Quiroz	<ul style="list-style-type: none"> • CUYAH_000043787 • MCKPUB00020576 • MCKPUB00020577 • MCKPUB00020579 • MCKPUB00029709 • MCKPUB00029711 • MCKPUB00029714
484.	Rolando Ramos	<ul style="list-style-type: none"> • CUYAH_000036131 • MCKPUB00020504 • MCKPUB00020505 • MCKPUB00020510
485.	Romell Ramsey	<ul style="list-style-type: none"> • CUYAH_000033573 • MCKPUB00020518 • MCKPUB00020519 • MCKPUB00020522
486.	Gary Ray, Jr.	<ul style="list-style-type: none"> • CUYAH_000034307 • CUYAH_000081451 • MCKPUB00013534 • MCKPUB00013535 • MCKPUB00013538 • MCKPUB00013541 • MCKPUB00013542 • MCKPUB00013547
487.	Matthew M. Ray	<ul style="list-style-type: none"> • AKRON_001217963 • MCKPUB00027636 • MCKPUB00027637 • MCKPUB00027640

	Name	Sources
488.	Rolando J. Reed	<ul style="list-style-type: none"> • MCKPUB00020264 • MCKPUB00020455 • MCKPUB00020461 • MCKPUB00020475 • MCKPUB00020478 • MCKPUB00029716
489.	Charles J. Rendino, Jr.	<ul style="list-style-type: none"> • AKRON_001175760 • MCKPUB00027643 • MCKPUB00027644 • MCKPUB00027646
490.	Shaquille D. Reynolds	<ul style="list-style-type: none"> • AKRON_000286625 • MCKPUB00020900 • MCKPUB00020902 • MCKPUB00020903
491.	Brock A. Richardson	<ul style="list-style-type: none"> • AKRON_000209946 • AKRON_001151503 • MCKPUB00008228 • MCKPUB00008230 • MCKPUB00008233 • MCKPUB00008235 • MCKPUB00008236 • SUMMIT_000064884 • SUMMIT_001135899
492.	Darshawn Antonio Richardson	<ul style="list-style-type: none"> • AKRON_000218427 • MCKPUB00009907 • MCKPUB00009909 • MCKPUB00009910
493.	Lisa A. Richardson	<ul style="list-style-type: none"> • MCKPUB00017638 • MCKPUB00017670 • MCKPUB00017677 • MCKPUB00017680
494.	Marquise D. Richardson	<ul style="list-style-type: none"> • AKRON_000288527 • MCKPUB00018269 • MCKPUB00018271 • MCKPUB00018272

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495.	Keith "K-Mack" Ricks	<ul style="list-style-type: none"> • MCKPUB00016066 • MCKPUB00016070
496.	Steven Riddle	<ul style="list-style-type: none"> • MCKPUB00021159 • MCKPUB00021163 • MCKPUB00021170 • MCKPUB00021171 • MCKPUB00021178 • MCKPUB00021180
497.	Sean Rieves	<ul style="list-style-type: none"> • CUYAH_000030719 • MCKPUB00020891 • MCKPUB00020892 • MCKPUB00020897
498.	Desmond El Riley	<ul style="list-style-type: none"> • AKRON_000205362 • MCKPUB00010562 • MCKPUB00010564 • MCKPUB00010565 • MCKPUB00010566 • MCKPUB00010568 • MCKPUB00010570 • MCKPUB00010571 • MCKPUB00010572
499.	Sovathana E. Rim	<ul style="list-style-type: none"> • CUYAH_006947578 • MCKPUB00021138 • MCKPUB00021139 • MCKPUB00021141
500.	Anthony D.M. Risten	<ul style="list-style-type: none"> • AKRON_000291595 • MCKPUB00006922 • MCKPUB00006924 • MCKPUB00006925
501.	Juan Rivera	<ul style="list-style-type: none"> • CUYAH_000033577 • MCKPUB00015952 • MCKPUB00015953 • MCKPUB00015956

	Name	Sources
502.	Jerome Rivers	<ul style="list-style-type: none"> • CUYAH_000074070 • MCKPUB00015587 • MCKPUB00015589 • MCKPUB00015592
503.	Calvin Roberts	<ul style="list-style-type: none"> • AKRON_000204267 • MCKPUB00008264 • MCKPUB00008265 • MCKPUB00008267
504.	Deshawn L. Roberts	<ul style="list-style-type: none"> • AKRON_000286230 • MCKPUB00010537 • MCKPUB00010539 • MCKPUB00010540
505.	Andre L. Robinson	<ul style="list-style-type: none"> • CUYAH_000038326 • MCKPUB00006587 • MCKPUB00006588 • MCKPUB00006591
506.	Darius Robinson (also known as Darius Robinson)	<ul style="list-style-type: none"> • MCKPUB00009611 • MCKPUB00009612 • MCKPUB00009618 • MCKPUB00009623
507.	Jay J. Robinson	<ul style="list-style-type: none"> • AKRON_000204406 • MCKPUB00027649 • MCKPUB00027650 • MCKPUB00027652
508.	Oscar Curtis Robinson	<ul style="list-style-type: none"> • MCKPUB00029742 • MCKPUB00029785
509.	Sabrina M. Robinson	<ul style="list-style-type: none"> • AKRON000204478 • MCKPUB00020837 • MCKPUB00020846 • MCKPUB00020849 • MCKPUB00020853 • MCKPUB00020861 • MCKPUB00020865 • MCKPUB00020867

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		<ul style="list-style-type: none"> • MCKPUB00020869
510.	Stanley L. Robinson	<ul style="list-style-type: none"> • MCKPUB00027694 • MCKPUB00027695 • MCKPUB00027698
511.	Travon D. Robinson	<ul style="list-style-type: none"> • AKRON_000218157 • MCKPUB00022300 • MCKPUB00022304 • MCKPUB00022305 • MCKPUB00022308 • MCKPUB00022295 • MCKPUB00022299
512.	William D. Robinson	<ul style="list-style-type: none"> • MCKPUB00022788
513.	Robert Lash Rodgers	<ul style="list-style-type: none"> • AKRON_000200889 • MCKPUB00020185 • MCKPUB00020186 • MCKPUB00020190 • MCKPUB00020191
514.	Alfonso Rodrigo	<ul style="list-style-type: none"> • MCKPUB00006320 • MCKPUB00006403 • MCKPUB00006410 • MCKPUB00006411 • MCKPUB00006415 • MCKPUB00006417 • MCKPUB00006430 • MCKPUB00027706 • MCKPUB00029786
515.	Octavio Rodrigo	<ul style="list-style-type: none"> • MCKPUB00019116 • MCKPUB00019199 • MCKPUB00019201 • MCKPUB00019208 • MCKPUB00019210

	Name	Sources
516.	Rafael A. Rodriguez	<ul style="list-style-type: none"> • CUYAH_000039201 • MCKPUB00019346 • MCKPUB00019348 • MCKPUB00019350
517.	Roberto Thomas Rodriguez	<ul style="list-style-type: none"> • AKRON_000201688 • MCKPUB00020208 • MCKPUB00020210 • MCKPUB00020211
518.	Dayviaire Michael Rogers	<ul style="list-style-type: none"> • AKRON_000223415 • AKRON_000298571 • MCKPUB00010335 • MCKPUB00010337 • MCKPUB00010338 • MCKPUB00010339 • MCKPUB00010341 • MCKPUB00010342
519.	Reginald Rogers	<ul style="list-style-type: none"> • AKRON_001281583 • MCKPUB00027700 • MCKPUB00027703 • MCKPUB00027704
520.	Rosalyn Rollins	<ul style="list-style-type: none"> • CUYAH_000034160 • MCKPUB00020565 • MCKPUB00020567 • MCKPUB00020570
521.	Steven Ross	<ul style="list-style-type: none"> • CUYAH_000038875 • MCKPUB00021182 • MCKPUB00021183 • MCKPUB00021190
522.	Leonte Roulette	<ul style="list-style-type: none"> • CUYAH_000073011 • MCKPUB00003944 • MCKPUB00003945 • MCKPUB00003948
523.	Rasean Lamont Rush	<ul style="list-style-type: none"> • AKRON_001276204 • MCKPUB00027719 • MCKPUB00027720 • MCKPUB00027722

	Name	Sources
524.	Colen W. Rushin	<ul style="list-style-type: none"> • AKRON_000201045 • MCKPUB00009060 • MCKPUB00009061 • MCKPUB00009063
525.	Tyshawn Russell	<ul style="list-style-type: none"> • CUYAH_000079731 • MCKPUB00022422 • MCKPUB00022423 • MCKPUB00022426
526.	Derrick Sales	<ul style="list-style-type: none"> • MCKPUB00010488 • SUMMIT_000070954
527.	Muhammad Salett	<ul style="list-style-type: none"> • MCKPUB00019008 • MCKPUB00019010
528.	DeWayne L. Sammons	<ul style="list-style-type: none"> • AKRON_00200775 • MCKPUB00019017 • MCKPUB00019025
529.	Mario Perez Sanchez	<ul style="list-style-type: none"> • MCKPUB00018204 • MCKPUB00018225 • MCKPUB00018212 • MCKPUB00018218 • MCKPUB00018227
530.	William A. Sanders	<ul style="list-style-type: none"> • AKRON_001216574 • MCKPUB00027725 • MCKPUB00027726 • MCKPUB00027728
531.	Willie L. Sanders, Jr.	<ul style="list-style-type: none"> • AKRON_000204406 • MCKPUB00027731 • MCKPUB00027732 • MCKPUB00027734 • MCKPUB00022777 • MCKPUB00022788 • MCKPUB00022791

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532.	Richard Sandy	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00019574 • MCKPUB00019577 • MCKPUB00019578 • MCKPUB00019581
533.	Angel M. Santiago	<ul style="list-style-type: none"> • CUYAH_000039503 • MCKPUB00006841 • MCKPUB00006842 • MCKPUB00006844
534.	Gregory T. Savage, Sr.	<ul style="list-style-type: none"> • MCKPUB00013896 • MCKPUB00014087 • MCKPUB00014089 • MCKPUB00014102 • MCKPUB00014105 • MCKPUB00029809
535.	Kevin M. Scott	<ul style="list-style-type: none"> • MCKPUB00016366 • MCKPUB00016557 • MCKPUB00016559 • MCKPUB00016573 • MCKPUB00016576 • MCKPUB00029845 • MCKPUB00029878
536.	Ocey Scott	<ul style="list-style-type: none"> • CUYAH_000038584 • MCKPUB00019086 • MCKPUB00019087 • MCKPUB00019090
537.	Jamesha A. Scurry	<ul style="list-style-type: none"> • MCKPUB00027736 • MCKPUB00027740 • MCKPUB00027742 • MCKPUB00027743
538.	Charles R. Seeley	<ul style="list-style-type: none"> • AKRON_001216354 • AKRON_001272421 • MCKPUB00027745 • MCKPUB00027746 • MCKPUB00027749

	Name	Sources
539.	Danny M. Senter	<ul style="list-style-type: none"> • AKRON_000201417 • MCKPUB00009529 • MCKPUB00009530 • MCKPUB00009532
540.	Jack C. Shaffer	<ul style="list-style-type: none"> • AKRON_001151503 • MCKPUB00014534 • MCKPUB00014539 • MCKPUB00014542 • MCKPUB00014543
541.	Marquis D. Shamell	<ul style="list-style-type: none"> • MCKPUB00027752 • MCKPUB00027753 • MCKPUB00027756
542.	Amanda M. Shaw	<ul style="list-style-type: none"> • AKRON_000201153 • MCKPUB00006552 • MCKPUB00006554 • MCKPUB00006555 • MCKPUB00006556 • MCKPUB00006558 • MCKPUB00006559
543.	Antwoine D. Sheffield	<ul style="list-style-type: none"> • AKRON_001217583 • MCKPUB00027759 • MCKPUB00027760 • MCKPUB00027763
544.	Marquess Shepard	<ul style="list-style-type: none"> • AKRON_001290062 • MCKPUB00027765 • MCKPUB00027766 • MCKPUB00027769
545.	Leamon Shephard	<ul style="list-style-type: none"> • MCKPUB00017369 • MCKPUB00017560 • MCKPUB00017566 • MCKPUB00017569 • MCKPUB00017586 • MCKPUB00029880 • MCKPUB00029916

	Name	Sources
546.	Juan D. Sheppard	<ul style="list-style-type: none"> • AKRON_000201818 • AKRON_001145139 • MCKPUB00015938 • MCKPUB00015940 • MCKPUB00015941 • MCKPUB00015942 • MCKPUB00015944 • MCKPUB00015945 • MCKPUB00015946 • MCKPUB00015949 • MCKPUB00015950 • MCKPUB00015951
547.	James A. Shipman	<ul style="list-style-type: none"> • CUYAH_000033120 • MCKPUB00014986 • MCKPUB00014987 • MCKPUB00014989
548.	Leroy Shuarod Steele	<ul style="list-style-type: none"> • MCKPUB00017618 • MCKPUB00017620
549.	Matt E. Shocklee	<ul style="list-style-type: none"> • MCKPUB00017599 • MCKPUB00017606 • MCKPUB00017609 • MCKPUB00017613 • MCKPUB00018304
550.	Damon D. Sibley	<ul style="list-style-type: none"> • AKRON_0003254145 • MCKPUB00009280 • MCKPUB00009282 • MCKPUB00009290 • MCKPUB00009292 • MCKPUB00009293 • MCKPUB00009294
551.	Gary Simpson	<ul style="list-style-type: none"> • CUYAH_000077157 • MCKPUB00013549 • MCKPUB00013550 • MCKPUB00013555

	Name	Sources
552.	Dustin Sinkovic	<ul style="list-style-type: none"> • CUYAH_000034495 • MCKPUB00011857 • MCKPUB00011858 • MCKPUB00011861
553.	Jeffrey Howard Sires	<ul style="list-style-type: none"> • AKRON_001157975 • MCKPUB00027772 • MCKPUB00027773 • MCKPUB00027775
554.	Christopher James Small	<ul style="list-style-type: none"> • AKRON_000218427 • AKRON_001287228 • MCKPUB00009001 • MCKPUB00009004 • MCKPUB00009006 • MCKPUB00009007
555.	Anthony Armani Smith	<ul style="list-style-type: none"> • AKRON_001142801 • MCKPUB00006888 • MCKPUB00006890 • MCKPUB00006891
556.	Daryl R. Smith	<ul style="list-style-type: none"> • AKRON_000297289 • MCKPUB00009917 • MCKPUB00009919 • MCKPUB00009920
557.	Julio J. Smith, Sr.	<ul style="list-style-type: none"> • CUYAH_000021000 • MCKPUB00015958 • MCKPUB00015959 • MCKPUB00015962
558.	Kevin Smith	<ul style="list-style-type: none"> • AKRON_000220016 • MCKPUB00016586 • MCKPUB00016588 • MCKPUB00016589
559.	Mario D. Smith	<ul style="list-style-type: none"> • CUYAH_000031231 • MCKPUB00018228 • MCKPUB00018229 • MCKPUB00018232

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560.	Roland Smith	<ul style="list-style-type: none"> • MCKPUB00020480 • MCKPUB00020483 • MCKPUB00020490 • MCKPUB00020495 • MCKPUB00029940
561.	Shane Smith	<ul style="list-style-type: none"> • MCKPUB00027814 • MCKPUB00027817 • MCKPUB00027818
562.	Timothy L. Smith	<ul style="list-style-type: none"> • MCKPUB00022214 • MCKPUB00027821 • MCKPUB00022223 • MCKPUB00022230
563.	Dean R. Snider, Jr.	<ul style="list-style-type: none"> • CUYAH_000037639 • MCKPUB00010355 • MCKPUB00010357 • MCKPUB00010359
564.	Dustin W. Somerville	<ul style="list-style-type: none"> • MCKPUB00011864
565.	Angelo Isaiah Sommerville	<ul style="list-style-type: none"> • AKRON_000206159 • SUMMIT_000458276 • SUMMIT_000721680 • MCKPUB00006873 • MCKPUB00006875 • MCKPUB00006876 • MCKPUB00006878 • MCKPUB00006881 • MCKPUB00006883
566.	Alfonso C. Soto	<ul style="list-style-type: none"> • CUYAH_000033120 • MCKPUB00006297 • MCKPUB00006298 • MCKPUB00006300

	Name	Sources
567.	Phillip Southall	<ul style="list-style-type: none"> • CUYAH_000034312 • MCKPUB00019292 • MCKPUB00019293 • MCKPUB00019296
568.	Arvis D. Spears	<ul style="list-style-type: none"> • AKRON_000292611 • MCKPUB00007506 • MCKPUB00007508 • MCKPUB00007509
569.	Maurice Edwards Speaight, Jr.	<ul style="list-style-type: none"> • AKRON_001145786 • AKRON_000204267 • AKRON_000286152 • MCKPUB00018333 • MCKPUB00018335 • MCKPUB00018336 • MCKPUB00018337 • MCKPUB00018340 • MCKPUB00018341
570.	Michael Steele, Jr.	<ul style="list-style-type: none"> • CUYAH_000034259 • MCKPUB00029976 • MCKPUB00029978 • MCKPUB00029981
571.	Alec Steinberger	<ul style="list-style-type: none"> • MCKPUB00006284 • MCKPUB00006292 • MCKPUB00006290
572.	Jonathan Stepp	<ul style="list-style-type: none"> • MCKPUB00015697 • MCKPUB00015780 • MCKPUB00015782 • MCKPUB00029983
573.	Raamses Coleus Stevens	<ul style="list-style-type: none"> • AKRON_000212335 • SUMMIT_001138100 • SUMMIT_001138183 • SUMMIT_000064880 • MCKPUB00019342 • MCKPUB00019345

	Name	Sources
574.	Mario R. Stewart	<ul style="list-style-type: none"> • CUYAH_000080248 • MCKPUB00018235 • MCKPUB00018236 • MCKPUB00018239
575.	Derek Scott Stiggers	<ul style="list-style-type: none"> • AKRON_000206457 • MCKPUB00010460 • MCKPUB00010463 • MCKPUB00010469 • MCKPUB00010471
576.	Tremayne R Stone	<ul style="list-style-type: none"> • AKRON_001157391 • MCKPUB00022328 • MCKPUB00022329 • MCKPUB00022332
577.	Richard Stormer	<ul style="list-style-type: none"> • CUYAH_000034495 • MCKPUB00019582 • MCKPUB00019583 • MCKPUB00019586
578.	Tramonte Lamar Stroud	<ul style="list-style-type: none"> • AKRON_000206233 • MCKPUB00022288 • MCKPUB00022289 • MCKPUB00022291 • MCKPUB00022292
579.	Justin Sudimak	<ul style="list-style-type: none"> • MCKPUB00016005 • MCKPUB00016011
580.	Anthony L. Suggs	<ul style="list-style-type: none"> • AKRON_000205256 • MCKPUB00006946 • MCKPUB00006950 • MCKPUB00006953 • MCKPUB00006954 • MCKPUB00006955 • MCKPUB00027851
581.	Larry L. Sullivan, Jr	<ul style="list-style-type: none"> • MCKPUB00017119

	Name	Sources
582.	Justin Sulzmann	<ul style="list-style-type: none"> • CUYAH_000039846 • MCKPUB00003307 • MCKPUB00003308 • MCKPUB00003311
583.	Ryan "TJ" Sumlin	<ul style="list-style-type: none"> • MCKPUB00020631 • MCKPUB00020633
584.	Alonzo B. Sykes	<ul style="list-style-type: none"> • MCKPUB00006482 • MCKPUB00006498 • MCKPUB00006501
585.	Allen Taborn	<ul style="list-style-type: none"> • MCKPUB00006477 • MCKPUB00006478 • MCKPUB00006480
586.	Dangelo Tapley	<ul style="list-style-type: none"> • AKRON_001132227 • MCKPUB00027853 • MCKPUB00027854 • MCKPUB00027856 • MCKPUB00027865
587.	Michael S. Tatum	<ul style="list-style-type: none"> • AKRON_001217676 • MCKPUB00027870 • MCKPUB00027871 • MCKPUB00027873
588.	James M. Taylor	<ul style="list-style-type: none"> • AKRON_000204616 • MCKPUB00015133 • MCKPUB00015135 • MCKPUB00015136 • MCKPUB00015137
589.	Lavell Taylor	<ul style="list-style-type: none"> • CUYAH_000031627 • MCKPUB00017352 • MCKPUB00017353 • MCKPUB00017355

	Name	Sources
590.	Willie Taylor	<ul style="list-style-type: none"> • CUYAH_000036745 • MCKPUB00022794 • MCKPUB00022795 • MCKPUB00022798
591.	Gus C. Tell, Jr.	<ul style="list-style-type: none"> • AKRON_000374687 • MCKPUB00027876 • MCKPUB00027877 • MCKPUB00027880
592.	Robert Tepper	<ul style="list-style-type: none"> • MCKPUB00019599 • MCKPUB00019602 • MCKPUB00019604 • MCKPUB00019605 • SUMMIT_000119179 • SUMMIT_001138729
593.	Trevez M. Terrell	<ul style="list-style-type: none"> • AKRON_000286477 • MCKPUB00022334 • MCKPUB00022336 • MCKPUB00022337
594.	David Thomas, Jr.	<ul style="list-style-type: none"> • AKRON_001145255 • MCKPUB00027883 • MCKPUB00027884 • MCKPUB00027886
595.	David Leroy Thomas	<ul style="list-style-type: none"> • MCKPUB00027888 • MCKPUB00027889 • MCKPUB00027892
596.	Kenneth M. Thomas	<ul style="list-style-type: none"> • AKRON_000207995 • AKRON_000211947 • MCKPUB00016287 • MCKPUB00016289
597.	Raffael D. Thomas	<ul style="list-style-type: none"> • MCKPUB00019378 • SUMMIT_001141093

	Name	Sources
598.	Rashaad Maurice Thomas	<ul style="list-style-type: none"> AKRON_000201181 MCKPUB00019403 MCKPUB00019405 MCKPUB00019406
599.	Stephen A. Thomas	<ul style="list-style-type: none"> CUYAH_002399328 MCKPUB00029985 MCKPUB00029986 MCKPUB00029988 MCKPUB00029992
600.	Tamartus Thomas	<ul style="list-style-type: none"> CUYAH_000080731 MCKPUB00021442 MCKPUB00021443 MCKPUB00021448
601.	Trevon Thomas	<ul style="list-style-type: none"> MCKPUB00022338 MCKPUB00022343 MCKPUB00022344 MCKPUB00029998 SUMMIT_000064880
602.	Reginald C. Thomas-Robinson	<ul style="list-style-type: none"> CUYAH_000054398 MCKPUB00019468 MCKPUB00019469 MCKPUB00019471
603.	Dionte Thompson	<ul style="list-style-type: none"> MCKPUB00010830 MCKPUB00011021 MCKPUB00011023 MCKPUB00011039 MCKPUB00011042 MCKPUB00030000 MCKPUB00030038
604.	Garland J. "Chill" Thompson	<ul style="list-style-type: none"> MCKPUB00013506 MCKPUB00013518 MCKPUB00013521
605.	Gary Blaine Thompson	<ul style="list-style-type: none"> AKRON_001218215 MCKPUB00027895 MCKPUB00027896

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00027899
606.	Terrick Thompson	<ul style="list-style-type: none"> • AKRON_000202961 • MCKPUB00021867 • MCKPUB00021875 • MCKPUB00030071 • MCKPUB00030072 • MCKPUB00030074 • MCKPUB00030075 • SUMMIT_000071039 • SUMMIT_001505077
607.	Tymaine Tedall Thompson	<ul style="list-style-type: none"> • AKRON_000200981 • MCKPUB00022364 • MCKPUB00022368 • MCKPUB00022369
608.	Paris D. Timmons	<ul style="list-style-type: none"> • AKRON_000212461 • MCKPUB00019249 • MCKPUB00019252
609.	Anthony L. Townsend	<ul style="list-style-type: none"> • AKRON_000204739 • MCKPUB00023754 • MCKPUB00023756 • MCKPUB00023757
610.	Tremaine L. "Juice" Townsend	<ul style="list-style-type: none"> • MCKPUB00022309 • MCKPUB00022310 • MCKPUB00022321 • MCKPUB00022327
611.	Chauncy A. Travis	<ul style="list-style-type: none"> • AKRON_000204629 • MCKPUB00008908 • MCKPUB00008911 • MCKPUB00008912
612.	Amonte L. Trice	<ul style="list-style-type: none"> • AKRON_001218931 • MCKPUB00027903 • MCKPUB00027904 • MCKPUB00027906

	Name	Sources
613.	Preston Tucker	<ul style="list-style-type: none"> • CUYAH_000034090 • MCKPUB00019333 • MCKPUB00019334 • MCKPUB00019339
614.	Tavaris Tucker	<ul style="list-style-type: none"> • CUYAH_000055327 • MCKPUB00021916 • MCKPUB00021917 • MCKPUB00021920
615.	Willie S. Tullis	<ul style="list-style-type: none"> • AKRON_000205918 • MCKPUB00022801 • MCKPUB00022804 • MCKPUB00022806 • MCKPUB00030076 • MCKPUB00030078 • MCKPUB00030079
616.	Devonte Rueben Turner	<ul style="list-style-type: none"> • AKRON_000294908 • AKRON_001151503 • MCKPUB00010805 • MCKPUB00010807 • MCKPUB00010808 • MCKPUB00010811 • MCKPUB00010812
617.	Joe Louis Turner II	<ul style="list-style-type: none"> • AKRON_001220880 • MCKPUB00015641 • MCKPUB00015645 • MCKPUB00015648 • MCKPUB00015650 • MCKPUB00015651
618.	Marshay L. Turner	<ul style="list-style-type: none"> • CUYAH_000079139 • MCKPUB00018273 • MCKPUB00018274 • MCKPUB00018277
619.	Michael D. Tyler	<ul style="list-style-type: none"> • AKRON_000288850 • MCKPUB00018675 • MCKPUB00018677 • MCKPUB00018678

	Name	Sources
620.	Elizabeth Ulrey	<ul style="list-style-type: none"> • AKRON_000212087 • MCKPUB00012271 • MCKPUB00012273 • MCKPUB00012274 • MCKPUB00012275 • SUMMIT_001138006 • SUMMIT_001138009
621.	Ambray Underwood	<ul style="list-style-type: none"> • CUYAH_000032047 • MCKPUB00006560 • MCKPUB00006563 • MCKPUB00006564
622.	David Urrabazo-Maldonado, Jr.	<ul style="list-style-type: none"> • MCKPUB00010228 • MCKPUB00010311 • MCKPUB00010318 • MCKPUB00010329
623.	Michael Vaden	<ul style="list-style-type: none"> • CUYAH_014631520 • MCKPUB00018949 • MCKPUB00018950 • MCKPUB00018953
624.	Tracy L. Vanhorn	<ul style="list-style-type: none"> • AKRON_000286843 • MCKPUB00022265 • MCKPUB00022266 • MCKPUB00022267 • MCKPUB00022269 • MCKPUB00022270
625.	Richard Vargas	<ul style="list-style-type: none"> • MCKPUB00024475 • MCKPUB00024478 • MCKPUB00024479
626.	LeTroy P. Vaughn	<ul style="list-style-type: none"> • AKRON_000288578 • MCKPUB00017624 • MCKPUB00017626 • MCKPUB00017627
627.	Neidalyz Vazquez	<ul style="list-style-type: none"> • CUYAH_000036277 • MCKPUB00004771 • MCKPUB00004772

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00004775
628.	Abimelec Vega	<ul style="list-style-type: none"> • MCKPUB00006226 • MCKPUB00006231 • MCKPUB00006233 • MCKPUB00006239 • MCKPUB00006241
629.	Mizraim Vega	<ul style="list-style-type: none"> • MCKPUB00006231 • MCKPUB00018975 • MCKPUB00018988 • MCKPUB00018982 • MCKPUB00018990 • MCKPUB00030080
630.	Lavester E. Vickers	<ul style="list-style-type: none"> • AKRON_000280183 • MCKPUB00017357 • MCKPUB00017359
631.	Brandon Wagner	<ul style="list-style-type: none"> • MCKPUB00007701 • MCKPUB00007704 • MCKPUB00007711 • MCKPUB00007714 • MCKPUB00007715 • MCKPUB00007719 • MCKPUB00007722 • MCKPUB00007725 • MCKPUB00007731
632.	Eric Walker	<ul style="list-style-type: none"> • MCKPUB00027992 • MCKPUB00027993 • MCKPUB00027996
633.	Roland Walker	<ul style="list-style-type: none"> • CUYAH_000053185 • MCKPUB00020497 • MCKPUB00020498 • MCKPUB00020501

	Name	Sources
634.	Jodarryel Wallace	<ul style="list-style-type: none"> • CUYAH_000030209 • MCKPUB00015624 • MCKPUB00015625 • MCKPUB00015628
635.	Bin Wang	<ul style="list-style-type: none"> • MCKPUB00007643
636.	Antonio M. Washington	<ul style="list-style-type: none"> • CUYAH_000029994 • MCKPUB00006992 • MCKPUB00006993 • MCKPUB00006996
637.	Duane Washington	<ul style="list-style-type: none"> • CUYAH_000070777 • MCKPUB00011851 • MCKPUB00011852 • MCKPUB00011855
638.	Jerome A. Watkins	<ul style="list-style-type: none"> • MCKPUB00024434 • MCKPUB00024437 • MCKPUB00024444 • MCKPUB00024448
639.	William G. Watkins	<ul style="list-style-type: none"> • AKRON_000204358 • MCKPUB00022743 • MCKPUB00022746 • MCKPUB00022747 • MCKPUB00022748 • MCKPUB00022751 • MCKPUB00022752
640.	Antwan Devonta Watson	<ul style="list-style-type: none"> • MCKPUB00007023 • MCKPUB00007025 • MCKPUB00007026 • MCKPUB00007027 • MCKPUB00007029 • MCKPUB00007030
641.	Clentonio Watson	<ul style="list-style-type: none"> • CUYAH_000039916 • CUYAH_000055469 • MCKPUB00009045 • MCKPUB00009046

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00009049
642.	Michael O. Watson	<ul style="list-style-type: none"> • CUYAH_000027734 • MCKPUB00018943 • MCKPUB00018944 • MCKPUB00018947
643.	Sergio D. Watson	<ul style="list-style-type: none"> • AKRON_001284245 • MCKPUB00027998 • MCKPUB00028003 • MCKPUB00028004
644.	Denay M. Webb	<ul style="list-style-type: none"> • MCKPUB00010408 • MCKPUB00010420 • MCKPUB00010423
645.	Jamez Jamel Webb II	<ul style="list-style-type: none"> • MCKPUB00015331 • MCKPUB00015333 • MCKPUB00015140 • MCKPUB00015346 • MCKPUB00015349
646.	Danny Weber	<ul style="list-style-type: none"> • AKRON_001279226 • MCKPUB00028006 • MCKPUB00028007 • MCKPUB00028010
647.	Scott T. Weisner	<ul style="list-style-type: none"> • MCKPUB00020881 • MCKPUB00020883 • SUMMIT_001138953 • SUMMIT_001138965
648.	Joshua M. Whethers	<ul style="list-style-type: none"> • MCKPUB00028012 • MCKPUB00028017 • MCKPUB00028019 • MCKPUB00028028 • MCKPUB00028031 • MCKPUB00028033 • MCKPUB00028035 • MCKPUB00028036

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00028038
649.	Jacob White	<ul style="list-style-type: none"> • CUYAH_000034430 • MCKPUB00014755 • MCKPUB00014756 • MCKPUB00014761
650.	Dashawn D'Anthony Whitlow	<ul style="list-style-type: none"> • AKRON_000201450 • MCKPUB00009921 • MCKPUB00009923 • MCKPUB00009924 • MCKPUB00009925 • MCKPUB00009927 • MCKPUB00009930 • MCKPUB00009935 • MCKPUB00009936
651.	John W. Whitmore	<ul style="list-style-type: none"> • CUYAH_000029834 • MCKPUB00015674 • MCKPUB00015675 • MCKPUB00015678
652.	Brian L. Williams	<ul style="list-style-type: none"> • MCKPUB00008191 • MCKPUB00008192 • MCKPUB00008194 • MCKPUB00008195 • MCKPUB00008205 • MCKPUB00030082 • MCKPUB00030091
653.	Carmen Christine Williams	<ul style="list-style-type: none"> • AKRON_000204584 • MCKPUB00008725 • MCKPUB00008727 • MCKPUB00008728 • MCKPUB00008731 • MCKPUB00008733 • MCKPUB00008736 • MCKPUB00008737

	Name	Sources
654.	Cortney Williams	<ul style="list-style-type: none"> • MCKPUB00009212 • MCKPUB00009219 • MCKPUB00009221 • MCKPUB00030103
655.	Dazmon R. Williams	<ul style="list-style-type: none"> • AKRON_000220700 • MCKPUB00010347 • MCKPUB00010350 • MCKPUB00010353 • MCKPUB00010354 • SUMMIT_000625447
656.	Delamar D. Williams	<ul style="list-style-type: none"> • MCKPUB00010366 • MCKPUB00010369 • MCKPUB00010370 • MCKPUB00010373 • MCKPUB00010375 • MCKPUB00010376 • MCKPUB00010380 • MCKPUB00030105 • MCKPUB00030112 • MCKPUB00030115
657.	Derrien A. Williams	<ul style="list-style-type: none"> • AKRON_000220960 • MCKPUB00010490 • MCKPUB00010491 • MCKPUB00010493
658.	Dominic D. Williams	<ul style="list-style-type: none"> • AKRON_000205625 • AKRON_000288343 • MCKPUB00011045 • MCKPUB00011047 • MCKPUB00011048
659.	Ejiro Williams	<ul style="list-style-type: none"> • CUYAH_000055866 • MCKPUB00012264 • MCKPUB00012266 • MCKPUB00012269
660.	Gregory Lee Williams	<ul style="list-style-type: none"> • AKRON_001218609 • MCKPUB00028063 • MCKPUB00028064

	Name	Sources
		<ul style="list-style-type: none"> • MCKPUB00028067
661.	Jamal H. Williams	<ul style="list-style-type: none"> • MCKPUB00014769 • MCKPUB00014960 • MCKPUB00014975 • MCKPUB00014978 • MCKPUB00030125
662.	John W. Williams IV	<ul style="list-style-type: none"> • MCKPUB00028070 • MCKPUB00028071 • MCKPUB00028073
663.	Kevin Williams	<ul style="list-style-type: none"> • MCKPUB00016590 • MCKPUB00016593 • MCKPUB00016618 • MCKPUB00016625 • MCKPUB00030127
664.	Latierra T. Williams	<ul style="list-style-type: none"> • CUYAH_000034002 • MCKPUB00017130 • MCKPUB00017132 • MCKPUB00017135
665.	Lavon Devon Williams	<ul style="list-style-type: none"> • MCKPUB00017360 • MCKPUB00017367
666.	Rashon Anthony Williams	<ul style="list-style-type: none"> • MCKPUB00019411 • MCKPUB00019417 • MCKPUB00019418 • MCKPUB00030185 • MCKPUB00030187 • MCKPUB00030188 • MCKPUB00030190 • SUMMIT_000064884 • SUMMIT_001142529 • SUMMIT_001142601

	Name	Sources
667.	Raymond L. Williams	<ul style="list-style-type: none"> • CUYAH_000041788 • MCKPUB00019431 • MCKPUB00019432 • MCKPUB00019434
668.	Rodney Williams	<ul style="list-style-type: none"> • CUYAH_000036147 • MCKPUB00020253 • MCKPUB00020254 • MCKPUB00020256
669.	Shaun D. Williams	<ul style="list-style-type: none"> • MCKPUB00020914 • MCKPUB00021105 • MCKPUB00021107 • MCKPUB00021120 • MCKPUB00021123 • MCKPUB00030191
670.	Terrance Williams	<ul style="list-style-type: none"> • AKRON_000206491 • MCKPUB00021839 • MCKPUB00021841 • MCKPUB00021842 • MCKPUB00021845 • MCKPUB00021847 • MCKPUB00021850 • MCKPUB00021851
671.	Randy Willis	<ul style="list-style-type: none"> • CUYAH_000040609 • MCKPUB00019390 • MCKPUB00019391 • MCKPUB00019394
672.	Rodney D. Willis	<ul style="list-style-type: none"> • CUYAH_000070777 • MCKPUB00020243 • MCKPUB00020244 • MCKPUB00020247
673.	Damon E. Wilson	<ul style="list-style-type: none"> • AKRON_001154747 • MCKPUB00009274 • MCKPUB00009278 • MCKPUB00009279

	Name	Sources
674.	Dereece D. Wilson	<ul style="list-style-type: none"> AKRON_000228041 MCKPUB00010438 MCKPUB00010444 MCKPUB00010445 SUMMIT_001138605
675.	Nathaniel Wilson	<ul style="list-style-type: none"> CUYAH_000033108 MCKPUB00019042 MCKPUB00019043 MCKPUB00019048
676.	Teon R. Wilson	<ul style="list-style-type: none"> AKRON_000201470 MCKPUB00021597 MCKPUB00021599 MCKPUB00021601 MCKPUB00021602
677.	Terry Lee Wilson	<ul style="list-style-type: none"> AKRON_000326304 MCKPUB00021897 MCKPUB00021901 MCKPUB00021910 MCKPUB00021911
678.	Gregory L. Winfield	<ul style="list-style-type: none"> CUYAH_000052488 MCKPUB00013890 MCKPUB00013891 MCKPUB00013894
679.	Shirleen Winfield	<ul style="list-style-type: none"> CUYAH_000052488 MCKPUB00021132 MCKPUB00021133 MCKPUB00021136
680.	Ryan J. Winston	<ul style="list-style-type: none"> AKRON_000207494 MCKPUB00020626 MCKPUB00020628 MCKPUB00020629
681.	Terry C. Winters	<ul style="list-style-type: none"> CUYAH_000030523 MCKPUB00021877 MCKPUB00021879 MCKPUB00021883

	Name	Sources
682.	Tia Marie Wise	<ul style="list-style-type: none"> AKRON_000294507 MCKPUB00022158 MCKPUB00022160
683.	Kevin Witt	<ul style="list-style-type: none"> CUYAH_000039947 MCKPUB00016627 MCKPUB00016628 MCKPUB00016632
684.	Kevin J. Wolverton	<ul style="list-style-type: none"> AKRON_001289227 MCKPUB00016634 MCKPUB00016636 MCKPUB00016637
685.	Angelo D. Wood	<ul style="list-style-type: none"> AKRON_000290891 MCKPUB00006868 MCKPUB00006871 MCKPUB00006872 SUMMIT_000678768
686.	Breanna Woods	<ul style="list-style-type: none"> CUYAH_000056835 MCKPUB00007951 MCKPUB00007952 MCKPUB00007955
687.	Deonte L. Woods	<ul style="list-style-type: none"> AKRON_000208074 AKRON_000223002 MCKPUB00010434 MCKPUB00010436 MCKPUB00010437
688.	Robert Worthy	<ul style="list-style-type: none"> CUYAH_000020902 MCKPUB00020203 MCKPUB00020204 MCKPUB00020206
689.	Raymundo Wren	<ul style="list-style-type: none"> MCKPUB00019436 MCKPUB00019438 MCKPUB00019451 MCKPUB00019454

	Name	Sources
690.	Darius M. Wright	<ul style="list-style-type: none"> • CUYAH_014630960 • MCKPUB00024216 • MCKPUB00024220 • MCKPUB00024221
691.	Marquel Diamond Wright	<ul style="list-style-type: none"> • AKRON_000200925 • AKRON_001217017 • MCKPUB00018267 • MCKPUB00018268
692.	Ramon Wright	<ul style="list-style-type: none"> • MCKPUB00030193 • MCKPUB00030194 • MCKPUB00030195
693.	Zaire M. Wright	<ul style="list-style-type: none"> • CUYAH_000078549 • MCKPUB00022808 • MCKPUB00022809 • MCKPUB00022812
694.	Dontez Yeager	<ul style="list-style-type: none"> • MCKPUB00011633 • MCKPUB00011636 • MCKPUB00011637 • MCKPUB00011638 • MCKPUB00011640 • MCKPUB00011641 • MCKPUB00030196
695.	David W. Yoak	<ul style="list-style-type: none"> • MCKPUB00028075 • MCKPUB00028076 • MCKPUB00028078
696.	Charles Yonkings	<ul style="list-style-type: none"> • CUYAH_000044641 • MCKPUB00008901 • MCKPUB00008902 • MCKPUB00008905
697.	Alfonso Yunis	<ul style="list-style-type: none"> • MCKPUB00006438 • MCKPUB00006443 • MCKPUB00006445 • MCKPUB00006451 • MCKPUB00006459

	Name	Sources
698.	Danny Zahand	<ul style="list-style-type: none">• CUYAH_000034468• MCKPUB00009533• MCKPUB00009534• MCKPUB00009537
699.	Cesar Zambrano-Espinal	<ul style="list-style-type: none">• MCKPUB00008757• MCKPUB00008840• MCKPUB00008842• MCKPUB00008849• MCKPUB00008852
700.	Fujing Zheng, also known as Gordon Jin	<ul style="list-style-type: none">• MCKPUB00013476• MCKPUB00013478
701.	Guanghua Zheng	<ul style="list-style-type: none">• MCKPUB00013476• MCKPUB00013478

APPENDIX B

APPENDIX B: LIST OF MATERIALS CONSIDERED

Deposition Transcripts

Transcript of Deposition of Kenneth Ball and Exhibits, Nov. 7, 2018
Transcript of Deposition of Matthew Paolino and Exhibits, Dec. 5, 2018
Transcript of Deposition of Greta Johnson and Exhibits, Jan. 15, 2019
Transcript of Deposition of Derek Siegle and Exhibits, Jan. 23, 2019
Transcript of Deposition of John Prince and Exhibits, Jan. 30, 2019
Transcript of Deposition of Patrick Leonard and Exhibits, Jan. 31, 2019
Transcript of Deposition of Kyle Wright and Exhibits, Feb. 28, 2019
Transcript of Deposition of Kyle Wright and Exhibits, Mar. 4, 2019
Transcript of Deposition of Demetra Ashley and Exhibits, Mar. 15, 2019
Transcript of Deposition of Patrick Leonard and Exhibits, Mar. 27, 2019
Transcript of Deposition of John Prince and Exhibits, Mar. 29, 2019
Transcript of Deposition of Lori Baker-Stella and Exhibits, Mar. 29, 2019
Transcript of Deposition of Keith Martin and Exhibits, Apr. 3, 2019
Transcript of Deposition of Stacy Harper-Avilla and Exhibits, Apr. 11, 2019
Transcript of Deposition of Thomas Prevoznik and Exhibits, Apr. 17, 2019
Transcript of Deposition of Thomas Prevoznik and Exhibits, Apr. 18, 2019
Transcript of Deposition of June Howard and Exhibits, Apr. 25, 2019
Transcript of Deposition of Joseph Rannazzisi and Exhibits, Apr. 26, 2019
Transcript of Deposition of James Rafalski and Exhibits, May 13, 2019
Transcript of Deposition of James Rafalski and Exhibits, May 14, 2019
Transcript of Deposition of Joseph Rannazzisi and Exhibits, May 15, 2019
Transcript of Deposition of Thomas Prevoznik and Exhibits, May 17, 2019
Transcript of Deposition of Patrick Leonard and Exhibits, May 23, 2019
Transcript of Deposition of John Prince and Exhibits, May 23, 2019
Transcript of Deposition of Lori Baker-Stella and Exhibits, May 23, 2019

Documents Produced In This Litigation

ABDCMDL00037184	HDS_MDL_00002462	MCKPUB00009235
AKRON_000201619	HDS_MDL_00005371	MCKPUB00009238
AKRON_000206798	MCKMDL00478906	MCKPUB00009240
AKRON_000236206	MCKMDL00496859	MCKPUB00009241
AKRON_000325481	MCKMDL00496876	MCKPUB00009242
AKRON_000337173	MCKPUB00000065	MCKPUB00009244
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AKRON_000344115	MCKPUB00000071	MCKPUB00009246
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CLEVE_000189730	MCKPUB00000727	MCKPUB00009254
CLEVE_000273623	MCKPUB00000807	MCKPUB00009255
CLEVE_001484132	MCKPUB00000808	MCKPUB00009257
CLEVE_001486342	MCKPUB00000810	MCKPUB00009262
CLEVE_004083991	MCKPUB00003647	MCKPUB00009263
CLEVE_2288891	MCKPUB00005188	MCKPUB00013570
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CUYAH_012915194	MCKPUB00006981	MCKPUB00024546

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MCKPUB00025076	MCKPUB00029985	SUMMIT_00132316
MCKPUB00025078	MCKPUB00029986	SUMMIT_002053458
MCKPUB00025079	MCKPUB00029988	US-DEA-00004802
MCKPUB00025081	MCKPUB00029992	US-DEA-00008563
MCKPUB00025082	OBN_MDL 1st Production 074923	US-DEA-00008565
MCKPUB00025084	OH-HIDTA_000526	US-DEA-00008577
MCKPUB00025086	OH-HIDTA_000701	US-DEA-00017914
MCKPUB00025088	OH-HIDTA_000937	US-DEA-00020544
MCKPUB00025234		

Interrogatories, Requests & Responses In This Litigation

Cuyahoga County's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen

Plaintiff the City of Cleveland's Supplemental Response and Objections to Distributor Defendants' Interrogatory Number 3 as Rewritten by Special Master David Cohen

Summit County & City of Akron, Ohio's Amended Responses and Objections to the Manufacturer Defendants' First Set of Interrogatories and the National Retail Pharmacy Defendants' First Set of Interrogatories

Summit County & City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to Distributor Defendants' Interrogatory Nos. 2, 3, 4, 8, 12, 14, 15, 16, 17, 23, 24, 27 & 29

Summit County & City of Akron, Ohio Plaintiff's Replacement Supplemental Responses and Objections to Manufacturer Defendants' Interrogatory Nos. 1, 2, 3, 5, 8, 9, 11, 12, 13, 15, 20, 21, 26, 27, 28 & 29

Summit County & City of Akron, Ohio Plaintiff's Supplemental Responses and Objections to National Retail Pharmacy Defendants' Interrogatory Nos. 4, 7, 15, 16 & 19

Acts of Congress

Comprehensive Drug Abuse Prevention and Control Act, Pub. L. No. 91-513, 84 Stat. 1236 (1970)

Hillary J Farias and Samantha Reid Date-Rape Drug Prohibition Act, H.R. 2130, 106th Cong. (2000)

Ryan Haight Online Pharmacy Consumer Protection Act, H.R. 6253, 110th Cong. (2008)

Comprehensive Methamphetamine Control Act, S. 1965, 104th Cong. § 2 (1996)

Statutes

21 U.S.C. § 821

21 U.S.C. § 822

21 U.S.C. § 823

21 U.S.C. § 824

21 U.S.C. § 827

31 U.S.C. § 5318

Regulations

21 C.F.R. § 21

21 C.F.R. § 1301.11

21 C.F.R. § 1301.31

21 C.F.R. § 1301.35

21 C.F.R. § 1301.36

21 C.F.R. § 1301.37

21 C.F.R. § 1301.71

21 C.F.R. § 1301.72

21 C.F.R. § 1301.73

21 C.F.R. § 1301.74

21 C.F.R. § 1301.75

21 C.F.R. § 1301.76

21 C.F.R. § 1304.04

21 C.F.R. § 1304.11

21 C.F.R. § 1305.12

28 C.F.R. § 0.100

28 C.F.R. § 0.101

31 C.F.R. § 1010

31 C.F.R. § 1020

Federal Register Documents

61 Fed. Reg. 4326

69 Fed. Reg. 5583

69 Fed. Reg. 62093

72 Fed. Reg. 50397

74 Fed. Reg. 15596

83 Fed. Reg. 5188

Congressional Hearings

Rogue Online Pharmacies: The Growing Problem of Internet Drug Trafficking, Hearing Before the S. Comm. on the Judiciary, 110th Cong. 110-472 (2007)

Improving Predictability and Transparency in DEA and FDA Regulation, Hearing Before the Subcomm. on Health of the H. Comm. on Energy and Commerce, 113th Cong., 113-137 (2014)

Examining the Growing Problems of Prescription Drug and Heroin Abuse, Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 113th Cong., 113-140 (2014)

Challenges and Solutions in the Opioid Crisis, Hearing Before the H. Comm. on the Judiciary, 115th Cong., 115-57 (2018)

Combatting the Opioid Crisis: Exploiting Vulnerabilities in International Mail, Hearing Before the Subcomm. on Investigations of the S. Comm. on Homeland Security and Governmental Affairs, 115th Cong., 115-317 (2018)

The Drug Enforcement Administration's Role in Combating the Opioid Epidemic, Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 115th Cong., 115-110 (2018)

Tackling Fentanyl: the China Connection, Hearing Before the Subcomm. on Africa, Global Health, Global Human Rights, and Internal Organizations of the H. Comm. on Foreign Affairs, 115th Cong., 115-169 (2016)

Tr. of Senate Judiciary Hearing on DEA Oversight, Testimony of Chuck Rosenberg (June 22, 2016)

Tr. of Senate Judiciary Hearing on DEA Oversight, Testimony of Demetra Ashley (Dec. 12, 2017)

Law Enforcement and the Fight against Methamphetamine: Improving Federal, State, and Local Efforts, Hearing Before the H. Comm. on Government Reform, 109th Cong., 109-103 (2005)

OIG & GAO Reports

U.S. Department of Justice, Office of the Inspector General, I-2002-010, Review of the Drug Enforcement Administration's Investigations of the Diversion of Controlled Pharmaceuticals (2002)

U.S. Department of Justice, Office of the Inspector General, I-2006-004, Follow-Up Review of the Drug Enforcement Administration's Efforts to Control the Diversion of Controlled Pharmaceuticals (2006)

U.S. Department of Justice, Office of the Inspector General, I-2008-002, Review of the Drug Enforcement Administration's Use of the Diversion Control Fee Account (2008)

U.S. Department of Justice, Office of the Inspector General, Audit Report 12-02, Audit of the Drug Enforcement Administration's Personnel Resource Management and Casework (2011)

U.S. Government Accountability Office, GAO-11-744, Prescription Drug Control: DEA Has Enhanced Efforts to Combat Diversion, But Could Better Assess and Report Program Results (2011)

U.S. Government Accountability Office, GAO-15-471, Prescription Drugs: More DEA Information about Registrants' Controlled Substances Roles Could Improve Their Understanding and Help Ensure Access (2015)

News & Journal Articles

Annamarya Scaccia, *How Fentanyl is Contaminating America's Cocaine Supply*, ROLLING STONE (Oct. 9, 2018, <https://www.rollingstone.com/culture/culture-features/fentanyl-cocaine-how-contamination-happens-735155/>)

BSA Advisory Group, *The SAR Activity Review: Trends, Tips & Issues, Issue 22, FINANCIAL CRIMES ENFORCEMENT NETWORK* (Oct. 2012)

DEA Announces Enhanced Tool for Registered Drug Manufacturers and Distributors to Combat Opioid Crisis (2019), <https://www.dea.gov/press-releases/2019/02/26/dea-announces-enhanced-tool-registered-drug-manufacturers-and>

DEA Domestic Divisions, <https://www.dea.gov/domestic-divisions>

Press Release, DEA, DEA Surge in Drug Diversion Investigations Leads to 28 Arrests and 147 Revoked Registrations (Apr. 2, 2018 <https://www.dea.gov/press-releases/2018/04/02/dea-surge-drug-diversion-investigations-leads-28-arrests-and-147-revoked>)

DEA's 17th National Prescription Drug Take Back Day Yields Fruitful Results in Georgia (2019), <https://www.dea.gov/press-releases/2019/05/06/deas-17th-national-prescription-drug-take-back-day-yields-fruitful> (last visited May 29, 2019)

DEA, Automation of Reports and Consolidated Orders System, <https://www.deadiversion.usdoj.gov/arcos/index.html> (last visited May 25, 2019)

DEA, Congressional Affairs, <https://www.dea.gov/congressional-affairs> (last visited May 25, 2019)

DEA, Controlled Substance and Legend Drug Diversion; A Law Enforcement and Regulatory Perspective, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2014/sept_2014/rannazzi_si.pdf (2014) (last visited May 29, 2019)

DEA, DEA Perspective: Pharmaceutical Use & Abuse, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2013/august_2013/prevoznik.pdf (2013) (last visited May 29, 2019)

DEA, Drug Trends, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2012/march_2012/drug_trends_0329.pdf (2012) (last visited May 29, 2019)

DEA, DEA Trends & Update, https://www.deadiversion.usdoj.gov/mtgs/pharm Awareness/conf_2017/aug5_2017/carrion.pdf (2017) (last visited May 29, 2019)

DEA, Fentanyl Drug Information Sheet (2018), https://www.deadiversion.usdoj.gov/drug_chem_info/fentanyl.pdf (last visited May 27, 2019).

Deni Carise et al, *Prescription OxyContin Abuse Among Patients Entering Addiction Treatment*, AMERICAN JOURNAL OF PSYCHIATRY (Nov. 1, 2007),

Douglas Montero, *The Comeback Drug: Police, Social Workers Fear Heroin ‘Epidemic’*, PLAIN DEALER, November 15, 1992

Drug Facts, *What is fentanyl?*, NATIONAL INSTITUTE OF HEALTH,
<https://www.drugabuse.gov/publications/drugfacts/fentanyl>

FinCEN Suspicious Activity Report (FinCEN SAR) Electronic Filing System, FINANCIAL CRIMES ENFORCEMENT NETWORK (Oct. 2012)

Guidance on Preparing A Complete & Sufficient Suspicious Activity Report Narrative, FINANCIAL CRIMES ENFORCEMENT NETWORK (Nov. 2003)

Hawre Jalal et al., *Changing dynamics of the drug overdose epidemic in the United States from 1979 through 2016*, SCIENCE MAGAZINE, Vol. 361 Issue 6408 (September 21, 2018)

How Did Enough Fentanyl to Kill “Every Man, Woman, and Child in Cleveland” Reach the United States?, 60 MINUTES (Apr. 25, 2019, <https://www.cbsnews.com/news/how-did-enough-fentanyl-to-kill-every-man-woman-and-child-in-cleveland-reach-the-united-states-60-minutes/>)

Intelligence Brief, *Counterfeit Prescription Pills Containing Fentanyl: A Global Threat*, DRUG ENFORCEMENT AGENCY, July 2016

James Rafalski, *Expert Report: Analysis of Distributor and Manufacturer Regulatory Compliance to Maintain Effective Controls for the Prevention of Diversion of Controlled Substances* (Apr. 15, 2019)

Julian Sher, *OxyContin smuggling from Canada rises sharply*, THE GLOBE AND MAIL (November 14, 2011, <https://www.theglobeandmail.com/life/health-and-fitness/oxycontin-smuggling-from-canada-rises-sharply/article547508/>)

Maggie Fox, *Why would anyone cut heroin with fentanyl? It’s cheap, these researchers say*, NBC News (Dec. 4, 2008, <https://www.nbcnews.com/storyline/americas-heroin-epidemic/why-would-anyone-cut-heroin-fentanyl-it-s-cheap-these-n943796>)

Max Daly, *The Truth About Drug Dealers Lacing Cocaine with Fentanyl*, VICE NEWS (Apr. 5, 2019, https://www.vice.com/en_us/article/8xyzkp/the-truth-about-drug-dealers-lacing-cocaine-with-fentanyl)

Pradip Muhuri, Joseph Gfroerer, and M. Christine Davies, *Associations of Nonmedical Pain Reliever Use and Initiation of Heroin Use in the United States*, CBHSQ DATA REVIEW (SAMSA) (Aug. 2013,

<https://www.samhsa.gov/data/sites/default/files/DR006/DR006/nonmedical-pain-reliever-use-2013.htm>

Reduce Prescription Drug Abuse, INSTITUTE FOR BEHAVIOR AND HEALTH,
<https://www.ibhinc.org/reduce-prescription-drug-abuse>

Sasha Ingber, *China To Close Loophole After U.S. Calls for Opioid Action*, NPR (Apr. 1, 2019,
<https://www.npr.org/2019/04/01/708801717/china-to-close-loophole-on-fentanyl-after-u-s-calls-for-opioid-action>)

Shane Hoover, *Has the opioid drug crisis peaked? Overdose deaths drop in Stark, Summit Counties*, AKRON BEACON JOURNAL, November 16, 2018

Sheehan Hannan, *Our Epidemic, Fighting the Opioid Problem*, Cleveland Magazine (Sept, 8, 2018, <https://clevelandmagazine.com/in-the-cle/our-epidemic/articles/our-epidemic-fighting-the-opioid-problem>)

U.S. Department of Treasury, *Frequently Asked Questions Regarding the FinCEN Suspicious Activity Report (SAR)*, <https://www.fincen.gov/frequently-asked-questions-regarding-fincen-suspicious-activity-report-sar> (last visited May 29, 2019)

Other Sources

Sources listed in Appendix A.

APPENDIX C

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Boerne, Texas 78006

Cell 305-796-7498

Email: azteclarry@yahoo.com

PROFESSIONAL EXPERIENCE

Corporate Integrity Services LLC (CIS)	2012 – Present
TurnStone Investigative Group	2008 – 2012
Drug Enforcement Administration (DEA)	1984 – 2007
Associate Special Agent in Charge (SES) Miami Field Division	June 2006
Regional Director Central America/Mexico (SES) Mexico City – United States Embassy	2002 – 2006
Appointed to Senior Executive Service (SES)	December 2002
Assistant Special Agent in Charge (GS-15) El Paso Field Division	2001 – 2002
Chief of Central American/Mexico Operations (GS-15) DEA Headquarters - Washington, DC	1999 – 2001
Liaison to the Central Intelligence Agency (GS-14) Acting Assistant Country Attaché Bogotá Colombia Country Office – United States Embassy	1996 – 1998 1988 - 1999
Accelerated Agent Training- covert operations Central Intelligence Agency Headquarters, VA	1996
Project Manager (GS-14) Alameda County Drug Enforcement Task Force – Oakland, CA	1994 – 1996
Group Supervisor (GS-14) Cocaine/Heroin Section San Francisco Field Division	1992 – 1994
Special Agent (GS -13) Guatemala, Belize, El Salvador region Guatemala City Country Office – United States Embassy	1988 – 1992
Special Agent - Enforcement Operations New Orleans Field Division	1984 - 1988
Special Agent St. Louis Field Division	1984

**Narcotics Detective, Patrol Officer, Cadet
St. Louis Metropolitan Police Department**

1970 - 1984

SECURITY CLEARANCE

Top Secret/SCI with additional clearances

PROFESSIONAL QUALIFICATIONS

Experience covers a wide variety of supervisory and investigative duties to include living in foreign environments using Spanish language capabilities for over 14 years. All assignments have involved extensive liaison with foreign and domestic law enforcement agencies, senior foreign government representatives, senior U.S. government officials as well as civilian entities such as banking officials and numerous private sector representatives.

- Key involvement in multiple projects to develop and implement agency wide operational procedures and standards, re-evaluating and modifying existing procedures to enhance security, streamline processes and provide cost savings to multi-million dollar budgets to the agency.
- As the most senior law enforcement official in Mexico/Central America, it was my responsibility to brief the United States Ambassadors on all issues of importance relating to DEA, ICE and FBI working throughout Mexico and Central America. The personnel of those agencies were under the umbrella of the DEA office in Mexico City. This position required excellent interpersonal skills and diplomacy to achieve the overall goals of the United States Mission throughout the region.
- Directly supervised hundreds of federal, state and local personnel working a wide range of criminal investigations, including multi-jurisdictional complex conspiracy investigations. Currently responsible for over 400 personnel with a multi-million dollar budget.
- Recipient of numerous awards including 2 DEA Administrators Awards and the prestigious Warren Medal from the Central Intelligence Agency.

EDUCATION

**Bachelors Degree in Criminal Justice/Political Science
Maryville University - St. Louis, MO**

1977

**Graduate Studies in Political Science
University of Texas at El Paso**

PROFESSIONAL ORGANIZATIONS

**International Association of Chiefs of Police (IACP)
Federal Law Enforcement Officers Association (FLEOA)**